

# EXHIBIT 2

**Getman, Sweeney & Dunn, PLLC**  
**Time Records**

**Partners**

Matt Dunn (MD)  
 Dan Getman (DG)  
 Michael Sweeney (MS)

**Attorneys**

Alex Dumas (AD)  
 Meagan Rafferty (MM)  
 Kimberly Webster (KIM)

**Data Scientists**

Mike Russo (MR)  
 Jason Kandel (JK)

**Paralegals**

Monica Ayres (MA)                      Misty Emerick (ME)  
 Julia Friday (JF)                      Anibal Garcia (AG)  
 Carolyn Mow (CM)                      Janice Pickering (JP)  
 Andrea Russo (AN)                      James Sherwood (JS)  
 Kathy Weiss (KW)

Date	Staff	Amount of Time	Description
1/24/2013	JP	0.9	further intake on two job titles [from potential client]
1/24/2013	JP	0.4	DG/JP review new facts to determine if properly exempt
1/24/2013	DG	0.4	DG/JP review new facts to determine if properly exempt
1/24/2013	JP	1.1	discussion of wage and hour practices to determine if legal violation
1/24/2013	JP	0.3	DG/JP discuss facts of case to determine if a violation
1/24/2013	DG	2.3	DG/JP discuss facts of case to determine if a violation .3; legal research on merits of claim
1/30/2013	JP	0.3	dg/JP review issues in determining outside sales exemption from research on current cases
1/30/2013	DG	0.3	dg/JP review issues in determining outside sales exemption from research on current cases
2/12/2013	DG	1.7	dg/jp call with client re facts of case 1.7
2/12/2013	JP	1.7	dg/jp call with client re facts of case 1.7
2/12/2013	JP	1.1	write memo to file that summarizes the facts of the duties, salary, and responsibilities of her two jobs
2/13/2013	DG	0.4	dg/md/jp discuss research needs for bringing claim .4
2/13/2013	JP	0.4	dg/md/jp discuss research needs for bringing claim .4
2/13/2013	MD	0.4	dg/md/jp discuss research needs for bringing claim .4
2/13/2013	MD	3.5	research[ ] outside sales case law and other cases against Kellogg's 3.5
2/13/2013	MD	0.2	md read[ ] client notes 0.2
2/13/2013	DG	0.1	edit and review retainer agreement .1
2/13/2013	AG	0.8	conduct Pacer search and gathering of cases related to Kellogg's
2/13/2013	JP	0.4	call to request documentation and to discuss retainer
2/13/2013	MD	0.1	md draft questions to ask potential client 0.1
2/14/2013	MD	0.2	md/dg discussing strength of claim and next steps for filing complaint 0.2
2/14/2013	DG	0.2	md/dg discussing strength of claim and next steps for filing complaint 0.2
2/14/2013	MD	1.5	md drafting complaint and review Washington statutes 1.5
2/14/2013	DG	0.4	dg/md/ms discuss merits of case and whether to bring .4
2/14/2013	MS	0.4	dg/md/ms discuss merits of case and whether to bring .4
2/14/2013	MD	0.4	dg/md/ms discuss merits of case and whether to bring .4
2/15/2013	MD	1.5	md edit[ ] complaint 1.5

Date	Staff	Amount of Time	Description
2/15/2013	MD	0.4	md speak with client 0.4
2/19/2013	CLER	0.3	Transfer billing record from intake to matter
2/19/2013	AG	0.1	create matter
2/19/2013	MD	3	md draft[ ] complaint 3.0
2/20/2013	CLER	0.2	prepare FedEx label and email to client
2/20/2013	MD	1.5	md edit[ ] complaint 1.5
2/20/2013	DG	0.3	md/dg discuss[ ] edits to complaint and additional facts/legal references needed 0.3
2/20/2013	AG	0.5	corporate research on the Kellogg Sales Company/Kellogg Company
2/20/2013	MD	0.3	md/dg discuss[ ] edits to complaint and additional facts/legal references needed 0.3
2/20/2013	DG	1.9	review complaint 1.2; legal research on statute of limitation .2; legal research on viability of unjust enrichment cause of action .5
2/20/2013	DG	0.3	look for local counsel in WDVA .3
2/20/2013	MD	1.5	md research[ ] Washington case law on meal/rest breaks, overtime requirements 1.5
2/20/2013	MD	1	md research[ ] Kellogg sales company 1.0
			md edit[ ] class and collective action complaint; research[ ] defendants, research[ ] different entities; research[ ] cases against Kellogg/Keebler; researching unjust enrichment claim 6.0
2/21/2013	MD	6	enrichment claim 6.0
2/21/2013	DG	0.1	review doc from client re what entity employs her .1
2/21/2013	DG	0.2	call to Michael Subit re local counsel .1; email re same .1
2/21/2013	DG	0.2	md/dg discussing edits to complaint 0.2
2/21/2013	MD	0.2	md/dg discussing edits to complaint 0.2
2/21/2013	MA	0.1	dg/kw/ma discuss paralegal needs for case .1
2/21/2013	KW	0.1	dg/kw/ma discuss paralegal needs for case .1
2/21/2013	MD	0.4	md speaking with client about facts 0.4
2/21/2013	DG	0.1	dg/kw/ma discuss paralegal needs for case .1
2/21/2013	DG	0.3	draft cocounsel agreement .3
2/22/2013	DG	0.2	md/dg discussing edits to complaint and raising additional claims 0.2
2/22/2013	MD	0.8	md/jp discussing complaint with client and edits based on client information 0.8
2/22/2013	JP	0.8	md/jp discussing complaint with client and edits based on client information 0.8
2/22/2013	MD	0.4	md researching requirements for recordkeeping 0.4
2/22/2013	MD	0.5	md drafting pro hac vice motion for dg and md 0.5
2/22/2013	DG	0.1	md/dg discussing response re complaint from local counsel 0.1
2/22/2013	MD	0.1	md/dg discussing response re complaint from local counsel 0.1
2/22/2013	DG	0.1	dg/md discuss edits to complaint re double damages under WMWA and FLSA .1
2/22/2013	MD	0.2	md reviewing local rules re pro hac vice 0.2
2/22/2013	MD	0.7	md editing complaint 0.7
2/22/2013	DG	1.2	edit complaint .9; emails to cocounsel re arrangement for co-counseling .3
2/22/2013	MD	0.1	dg/md discuss edits to complaint re double damages under WMWA and FLSA .1
			md/dg/ms discussing litigation strategy and raising nationwide unjust enrichment claim
2/22/2013	MS	0.4	0.4
			md/dg/ms discussing litigation strategy and raising nationwide unjust enrichment claim
2/22/2013	MD	0.4	0.4
			Downloading pro hac vice application and converting it to Word to give to MD to fill
2/22/2013	MA	0.2	out/sign
2/22/2013	MD	0.2	md writing local counsel re edits to complaint 0.2

Date	Staff	Amount of Time	Description
2/22/2013	MD	0.2	md/dg discussing edits to complaint and raising additional claims 0.2
			md/dg/ms discussing litigation strategy and raising nationwide unjust enrichment claim
2/22/2013	DG	0.4	0.4
2/22/2013	MD	0.2	md edit complaint based on local counsel recommendations 0.2
2/22/2013	MD	0.2	md prepare complaint for filing and review local rules on information needed 0.2
2/22/2013	MD	0.3	md edit complaint to eliminate class based on information from client 0.3
2/22/2013	DG	0.3	dg call to Mike Subit about being local counsel .3
2/22/2013	MD	0.1	md reviewing email from client 0.1
			dg/md/jlp/kw Litigation team meeting to review issues and make decisions related to: filing complaint; service to defendants, contact with future plaintiffs, documentation needed from named plaintiff; and posting information on the office website .4; review retainer with respect to local counsel for signature by plaintiff .1; review new doc re same
2/24/2013	DG	0.6	.1
2/25/2013	DG	0.4	read Hershey's RSR FWW decision for calc of damages .4
2/25/2013	MD	0.1	dg/md evaluate whether to make break claims a separate cause of action .1
2/25/2013	CM	0.3	prepare reimbursement check and cover letter for co-counsel costs (.3)
			dg/md/kw case briefing for paralegal regarding issues, complaint and documents needed
2/25/2013	DG	0.2	and filing Rule 23 state class claim
2/25/2013	AG	0.8	prepare document for filing of complaint (civil cover, summons to defendants)
			dg/md/kw case briefing for paralegal regarding issues, complaint and documents needed
2/25/2013	MD	0.2	and filing Rule 23 state class claim
			md/dg discussing documents to order from Keebler lawsuit and discussing
2/25/2013	MD	0.2	misclassification case on behalf of RSRs in Hershey 0.2
			dg/md evaluate whether to make break claims a separate cause of action .1; draft
2/25/2013	DG	0.5	complaint re RSRs and state law .4
			md/dg discussing documents to order from Keebler lawsuit and discussing
2/25/2013	DG	0.2	misclassification case on behalf of RSRs in Hershey 0.2
2/25/2013	MD	0.3	md/dg call with local counsel re edits to complaint 0.3
2/25/2013	MD	2.5	md drafting collective action motion 2.5
2/25/2013	MD	1	md editing complaint to include individual claims for plaintiff and Washington opt-ins 1.0
			Transfer documents recd from ECF system to docket file and create file copy(Docket#93 - REPLY in Support of MOTION to Stay Case pending Resolution of Defendants' Interlocutory Appellate Rights (Stay Arbitration)[84] filed by Defendant Central
2/25/2013	CLER	0.1	Refrigerated Services Inc. (Hansen, Drew)
			md reviewing documents from Keebler lawsuit on behalf of RSRs and Territory Managers
2/25/2013	MD	0.4	0.4
2/25/2013	MD	0.5	md researching WDWA caselaw for collective action 0.5
			md/dg discussing defendant's admission that territory managers primary job duty was
2/25/2013	DG	0.2	not sales 0.2
2/25/2013	MD	0.2	md review complaint sent by local counsel 0.2
			md/dg discussing defendant's admission that territory managers primary job duty was
2/25/2013	MD	0.2	not sales 0.2
			dg/md/kw case briefing for paralegal regarding issues, complaint and documents needed
2/25/2013	KW	0.2	and filing Rule 23 state class claim
2/26/2013	MD	0.4	md reviewing CA class action documents for admissions to support collective action 0.4
2/26/2013	MD	0.3	md drafting postcard reminder 0.3
2/26/2013	KW	0.2	begin to read case information and emails to prepare to be case paralegal

Date	Staff	Amount of Time	Description
2/26/2013	MD	0.4	md drafting Thomas declaration 0.4
2/26/2013	MD	1	md editing collective action motion 1.0
2/26/2013	KW	0.1	update contact information files for co-counsel
2/26/2013	MD	2	md researching caselaw for collective action motion 2.0
2/26/2013	DG	0.1	review filing of cplt .1
2/26/2013	MD	1	md drafting collective action motion 1.0
2/27/2013	MD	0.3	md drafting addendum to retainer 0.3
2/27/2013	JP	0.4	jl原因/kw discuss named plaintiff's claims and facts of the complaint-focusing on job duties, hours worked and compensation
2/27/2013	MD	0.1	md prepare agenda for meeting about next steps in litigation 0.1
2/27/2013	DG	1.4	edit website statement for class members .4; post case info to website in conformity w NY ethical rules 1; begin to read case file and take notes regarding key issues related to job duties, hours worked and compensation plan
2/27/2013	KW	0.4	worked and compensation plan
2/27/2013	MD	0.3	md drafting email to client about status of case and filing of complaint
2/27/2013	MD	0.5	md researching caselaw on Washington Consumer Protection Act and assessing possibility of bring claim under this cause of action 0.5
2/27/2013	JP	0.4	dg/md/jlp/kw Litigation team meeting to review issues and make decisions related to: filing complaint; service to defendants, contact with future plaintiffs, documentation needed from named plaintiff; and posting information on the office website
2/27/2013	AR	0.8	Draft templates for releasing case information .8
2/27/2013	KW	0.2	organize electronic file of documents
2/27/2013	MD	0.4	dg/md/jlp/kw Litigation team meeting to review issues and make decisions related to: filing complaint; service to defendants, contact with future plaintiffs, documentation needed from named plaintiff; and posting information on the office website
2/27/2013	KW	0.4	jl原因/kw discuss named plaintiff's claims and facts of the complaint-focusing on job duties, hours worked and compensation
2/27/2013	MA	0.1	Posting case update to Facebook page [ ]
2/27/2013	MD	0.2	adding case number of pro hac vice motions, collective action motion, and consent to sue 0.2
2/27/2013	KW	0.3	draft new consent to sue form, including all defendant companies
2/27/2013	KW	0.4	MD/JLP/KW Discussion with named plaintiff to review filing complaint process, next steps in litigation process, introduce new paralegal and answer any questions
2/27/2013	KW	0.4	dg/md/jlp/kw Litigation team meeting to review issues and make decisions related to: filing complaint; service to defendants, contact with future plaintiffs, documentation needed from named plaintiff; and posting information on the office website
2/27/2013	KW	0.5	Read factual basis of complaint to prepare to take over responsibilities as lead paralegal read case notes read email notice to named plaintiff and comment review website posting and suggest revisions
2/27/2013	JP	0.4	MD/JLP/KW Discussion with named plaintiff to review filing complaint process, next steps in litigation process, introduce new paralegal and answer any questions
2/27/2013	MD	0.4	MD/JLP/KW Discussion with named plaintiff to review filing complaint process, next steps in litigation process, introduce new paralegal and answer any questions
2/27/2013	MD	0.3	md draft litigation hold letter 0.3

Date	Staff	Amount of Time	Description
2/27/2013	DG	0.1	review research re using WA business law to extend statute of limitation for state wage hour claims .1
2/27/2013	KW	0.6	review INTAKE file; organize open case electronic files--Legal Research, Fact Notes, Client files -all for efficient access by litigation team
2/28/2013	MD	0.2	md speaking with client filing of case and potential other class members 0.2
2/28/2013	DG	0.1	web research on Kellogg's past and present wage hour suits .1
2/28/2013	MS	0.1	review and comment on web posting
2/28/2013	MS	0.1	review and comment on web posting re employer contact
3/4/2013	KW	0.5	draft welcome-evidence preservation letter to be sent to all plaintiffs .4 email draft to attorney for review .1
3/5/2013	DG	0.2	reading defs email to employees about non-cooperation and threatening them w HR action .1; email responses to litigation team re same .1
3/6/2013	MD	1.5	md researching course of action because of Kellogg's contact with putative class members 1.5
3/6/2013	MD	0.4	md speak with NLRB intake re filing a charge that includes 10j relief 0.4
3/11/2013	DG	0.1	md/dg reviewing google ad terms for case 0.1
3/11/2013	MD	0.1	md/dg discussing edits to NLRB charge 0.1
3/11/2013	DG	0.1	md/dg discussing edits to NLRB charge 0.1
3/11/2013	MD	0.2	md/kw discuss means to reach out to additional class members
3/11/2013	KW	0.2	md/kw discuss means to reach out to additional class members
3/11/2013	MD	0.5	md drafting NLRB charge against Kellogg 0.5
3/11/2013	KW	0.6	draft letter to be sent to potential class members .5 circulate to litigation team for review, revision and edit .1
3/11/2013	KW	0.1	email to litigation team re procedure for contacting potential opt-ins
3/11/2013	MD	0.1	md/dg reviewing google ad terms for case 0.1
3/11/2013	MD	0.3	md/kw discussing how to reach other class members 0.3
3/11/2013	KW	0.3	md/kw discussing how to reach other class members 0.3
3/11/2013	DG	0.2	review and edit ULP charge .2
3/11/2013	MD	0.5	md editing collective action motion 0.5
3/11/2013	MD	0.2	md editing NLRB charge 0.2
3/11/2013	DG	0.2	md/dg discussing how to handle defense counsel's attempts for encouraging class members from participating in case 0.2
3/11/2013	KW	0.4	fact finding discussions with named plaintiff to answer her questions and clarify job functions of potential class members
3/11/2013	DG	1.5	edit letter to other workers re joining case .4; draft letter to Littler re requirement to avoid chill 1.1
3/11/2013	MD	0.2	md correspond with client re nlr charge 0.2
3/11/2013	MD	0.2	md speak with client about NLRB charge 0.2
3/11/2013	MD	0.2	md/dg discussing how to handle defense counsel's attempts for encouraging class members from participating in case 0.2
3/11/2013	MD	0.1	md send client copy of NLRB charge 01
3/12/2013	JP	0.4	jlp/kw discuss facts presented by new opt-in; discuss key case issues, job description, answering possible defenses sales and or administrative exemptions
3/12/2013	KW	0.1	email to attorney regarding our office being added to ECF filing list for Docket
3/12/2013	MD	0.3	md reviewing NLRB filing and communicating with client about facts 0.3
3/12/2013	MD	0.1	md/kw discuss documents and work needed to prepare filing for NLRB
3/12/2013	MD	0.2	md/kw discuss follow-up contacts to be made to potential class members
3/12/2013	MD	0.1	md reviewing notes of new client 0.1

Date	Staff	Amount of Time	Description
			dg/kw discuss revisions to information letter to be sent to putative class members
3/12/2013	DG	0.1	discuss email version of information
3/12/2013	JP	0.4	review and organize intake information for efficient access by litigation team.
3/12/2013	DG	0.2	dg/md discuss terms of letter to def re chilling communication with class .2
3/12/2013	JP	0.1	jlp/kw discuss issues related to latest intake interview to clarify claims
			jlp/kw fact finding intake interview with new opt-in to gather information related to job
3/12/2013	JP	0.7	duties, hours and the complaint
3/12/2013	KW	0.2	md/kw discuss follow-up contacts to be made to potential class members
3/12/2013	KW	0.1	md/kw discuss documents and work needed to prepare filing for NLRB
			md editing letter to defense counsel/defendant re improper contact with class members
3/12/2013	MD	0.3	0.3
			jlp/kw discuss facts presented by new opt-in; discuss key case issues, job description,
3/12/2013	KW	0.4	answering possible defenses sales and or administrative exemptions
3/12/2013	MD	0.2	dg/md discuss terms of letter to def re chilling communication with class .2
			md researching happy camper declarations secured by defense counsel in support of
3/12/2013	MD	2	letter to send defendants 2.0
3/12/2013	AG	0.5	prepare documents for filing with NLRB with copy to Kellogg via Priority Mail USPS
			jlp/kw fact finding intake interview with new opt-in to gather information related to job
3/12/2013	KW	0.7	duties, hours and the complaint
3/12/2013	MA	0.1	Call from intake [redacted] to discuss joining
			dg/md/jp/kw discuss need to reach out to putative class members and means to do so
3/12/2013	JP	0.2	discuss latest opt-in form NV and possible class action
			dg/kw discuss revisions to information letter to be sent to putative class members
3/12/2013	KW	0.1	discuss email version of information
			dg/md/jp/kw discuss need to reach out to putative class members and means to do so
3/12/2013	MD	0.2	discuss latest opt-in form NV and possible class action
			dg/md/jp/kw discuss need to reach out to putative class members and means to do so
3/12/2013	DG	0.2	discuss latest opt-in form NV and possible class action
3/12/2013	MD	0.2	md researching defense counsel in Kellogg case 0.2
			scan NLRB charge form .1 update electronic file of materials needed to file NLRB charge-
3/12/2013	CLER	0.3	including complaint and email from HR to staff .2
			Transfer documents recd from ECF system to docket file and create file copy(Docket#2 -
			CIVIL COVER SHEET re 1 Complaint ; filed by Plaintiff Patty Thomas.. (Subit, Michael)
3/12/2013	CLER	0.1	(Entered: 02/26/2013)
3/12/2013	MD	0.2	md reviewing solicitation letter 0.2
3/12/2013	MD	0.1	md/jp discussing numerosity requirement for class action 0.1
			Transfer documents recd from ECF system to docket file and create file copy(Docket#3 -
			PRAECIPE TO ISSUE SUMMONS by Plaintiff Patty Thomas. (Subit, Michael) (Entered:
3/12/2013	CLER	0.1	02/26/2013)
3/12/2013	AG	2.4	conduct search of current/former employee (mining)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#4 -
			PRAECIPE TO ISSUE SUMMONS by Plaintiff Patty Thomas. (Subit, Michael) (Entered:
3/12/2013	CLER	0.1	02/26/2013
			Transfer documents recd from ECF system to docket file and create file copy(Docket#5 -
			PRAECIPE TO ISSUE SUMMONS by Plaintiff Patty Thomas. (Subit, Michael) (Entered:
3/12/2013	CLER	0.1	02/26/2013
			md/kw joint interview with putative class member specifically discussing retaliation fears,
3/12/2013	MD	0.5	job duties, hours, and case claims



Date	Staff	Amount of Time	Description
3/12/2013	CLER	0.2	prepare welcome ltrs to new client
3/12/2013	AG	0.2	md/ag discussing filing NLRB charge 0.2
3/12/2013	MD	0.2	md/ag discussing filing NLRB charge 0.2
3/12/2013	KW	0.4	review and save documents sent by named plaintiff update electronic file Transfer documents recd from ECF system to docket file and create file copy(Docket#7 - PRAECIPE TO ISSUE SUMMONS by Plaintiff Patty Thomas. (Subit, Michael) (Entered: 02/26/2013)
3/12/2013	CLER	0.1	02/26/2013 Transfer documents recd from ECF system to docket file and create file copy(Docket#8 - PRAECIPE TO ISSUE SUMMONS by Plaintiff Patty Thomas. (Subit, Michael) (Entered: 02/26/2013)
3/12/2013	CLER	0.1	02/26/2013 Transfer documents recd from ECF system to docket file and create file copy(Docket#9 - ORDER REGARDING DISCOVERY AND DEPOSITIONS by Judge Ronald B. Leighton. (DN) (Entered: 02/28/2013)
3/12/2013	CLER	0.1	(Entered: 02/28/2013)
3/12/2013	MD	0.2	md outline needs for conversation with intakes/clients 0.2
3/12/2013	MD	0.2	md reviewing documents provided by client 0.2
3/12/2013	KW	0.1	jlp/kw discuss issues related to latest intake interview to clarify claims Transfer documents recd from ECF system to docket file and create file copy(Docket#6 - PRAECIPE TO ISSUE SUMMONS by Plaintiff Patty Thomas. (Subit, Michael) (Entered: 02/26/2013)
3/12/2013	CLER	0.1	02/26/2013
3/12/2013	KW	0.2	draft follow-up email to putative class member
3/12/2013	KW	0.2	respond to email from new plaintiff .1 scan and process consent to sue .1
3/12/2013	JP	0.1	message to contact me to do intake
3/12/2013	DG	3.7	prepare letter brief to defense counsel re communications with the class 2.2; legal research re happy camper declarations .3; send email to listserve for further help on letter .1; legal research cases sent by listserve .9; call to Littler atty representing Kellogg in another case .1; prepare email to Ybarra (counsel for Kellogg) re same .1 dg/md/jp/kw discuss need to reach out to putative class members and means to do so
3/12/2013	KW	0.2	discuss latest opt-in form NV and possible class action
3/12/2013	JP	0.1	email regarding documentation & information needed
3/12/2013	KW	0.1	review additions and edits to draft mining letter
3/12/2013	KW	1.1	fact finding intake interview with putative class member
3/12/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#10 - ORDER REGARDING INITIAL DISCLOSURES AND JOINT STATUS REPORT Joint Status Report due by 5/29/2013, FRCP 26f Conference Deadline is 5/15/2013, Initial Disclosure Deadline is 5/22/2013, by Judge Ronald B. Leighton. (DN) (Entered: 02/28/2013)
3/12/2013	AG	0.2	PCT NLRB filing procedure (efile or mail)
3/13/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#13 - ORDER on the 11 Application for Leave to Appear Pro Hac Vice. The Court ADMITS Dan Getman for Patty Thomas, by William M. McCool. (No document associated with this docket entry, text only.)(CMG) (Entered: 03/12/2013)
3/13/2013	CLER	0.1	03/12/2013 Transfer documents recd from ECF system to docket file and create file copy(Docket#12 - APPLICATION OF ATTORNEY Matt Dunn FOR LEAVE TO APPEAR PRO HAC VICE for Plaintiff Patty Thomas (Fee Paid) Receipt No. 0981-3137359. (Subit, Michael) (Entered: 03/12/2013)
3/13/2013	AR	0.4	Draft changes to case filing status .4



Date	Staff	Amount of Time	Description
3/13/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#11 - APPLICATION OF ATTORNEY Dan Getman FOR LEAVE TO APPEAR PRO HAC VICE for Plaintiff Patty Thomas (Fee Paid) Receipt No. 0981-3137327. (Subit, Michael) (Entered: 03/12/2013)
3/13/2013	AG	1.5	conduct search of current/former employee (mining)
3/13/2013	MD	0.1	md edit press release 0.1
3/13/2013	KW	0.4	organize information from fact finding interview detailing information related to complaint record information and circulate to litigation team
3/13/2013	AG	0.3	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
3/13/2013	MD	0.1	md review documents produced by client 0.1
3/13/2013	AG	0.1	create Postage code for billing
3/13/2013	JP	1.6	call to discuss facts of employment and hours worked and facts regarding sales with defendant, 1.5; email link to website and docs needed, .1
3/13/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Michael Heiner)(
3/13/2013	KW	0.2	review and update electronic file of names and address of potential class members received from named plaintiff .1 email lists to AG to search for addresses and related contact information .1
3/13/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#15 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael Heiner)(Dunn, Matt)
3/13/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#14 - ORDER on the [12] Application for Leave to Appear Pro Hac Vice. The Court ADMITS Matt Dunn for Patty Thomas, by William M. McCool. (No document associated with this docket entry, text only.)(CMG)
3/13/2013	MD	0.3	md edit press release 0.3
3/13/2013	DG	0.4	draft press release .3; review client documents .1
3/13/2013	MD	0.2	md review and edit notice of filing consent to sue form 0.
3/13/2013	JP	0.1	left voice message in response to his request to contact him for intake
3/14/2013	JP	0.1	review draft letter to putative class members
3/14/2013	MD	0.4	md editing attorney advertising letter 0.4
3/14/2013	KW	0.4	revise letter to be sent to putative class members .3 email to litigation team for review and comment .1
3/14/2013	KW	0.5	format email to putative class members .1 send emails .4
3/14/2013	KW	0.1	KW/MA prepare information for sending mining letters to potential clients
3/14/2013	MD	0.1	md coordinate time to talk with client about NLRB charge 0.1
3/14/2013	JP	0.1	left voice message in response to request for info on case
3/14/2013	DG	0.1	md/dg discussing video for case 0.1
3/14/2013	MD	0.1	md/dg discussing video for case 0.1
3/14/2013	MD	0.1	md listen to voicemail from NLRB re wanting follow up re charge 0.1
3/14/2013	MA	0.1	KW/MA prepare information for sending mining letters to potential clients
3/14/2013	JP	1.2	discussed facts of job duties and hours worked with Kellogg
3/14/2013	DG	0.1	call from NLRB re charge .1
3/14/2013	DG	1	prepare advertising letter to class members to join case.4; prepare advertising email to class members to join case .3; check Washington ethical rules before sending advertising letter .3
3/14/2013	KW	0.3	dg/md/jp/kw discuss attorney advertising .1 finalize tasks for letter and email communications with putative class members .1 clarify understanding of job titles and job descriptions for class members-necessary to determine who is eligible to file consent to sue .1

Date	Staff	Amount of Time	Description
3/14/2013	KW	0.1	dg/md/kw discuss and approve communication to putative class members
3/14/2013	CLER	0.2	prepare FedEx mailing of letter with attachments for mailing to Deft (NLRB Complaint) edit and organize intake information to facilitate access by litigation team and to
3/14/2013	JP	0.2	determine additional facts needed add information to excel spreadsheet of data regarding individual intakes for efficient
3/14/2013	KW	0.3	tracking of information ma/kw review list of putative class members to identify those needing a contact .1
3/14/2013	MA	0.2	review communication to be sent .1 dg/md/jp/kw discuss attorney advertising .1 finalize tasks for letter and email communications with putative class members .1 clarify understanding of job titles and job descriptions for class members-necessary to determine who is eligible to file consent
3/14/2013	DG	0.3	to sue .1 dg/md/jp/kw discuss attorney advertising .1 finalize tasks for letter and email communications with putative class members .1 clarify understanding of job titles and job descriptions for class members-necessary to determine who is eligible to file consent
3/14/2013	JP	0.3	to sue .1 dg/md/jp/kw discuss attorney advertising .1 finalize tasks for letter and email communications with putative class members .1 clarify understanding of job titles and job descriptions for class members-necessary to determine who is eligible to file consent
3/14/2013	MD	0.3	to sue .1
3/14/2013	MD	0.1	dg/md/kw discuss and approve communication to putative class members
3/14/2013	DG	0.1	dg/md/kw discuss and approve communication to putative class members MD/JP review facts provided by potential opt in, reviewed possibility of class rep and
3/14/2013	JP	0.4	reviewed follow up information needed for amended complaint ma/kw review list of putative class members to identify those needing a contact .1
3/14/2013	KW	0.2	review communication to be sent .1
3/14/2013	CLER	0.3	prepare this letter with attachments for mailing to Deft's counsel
3/14/2013	JP	0.2	md/jp discussing intake for additional class member 0.2
3/14/2013	AG	1	conduct search of current/former employee (mining)
3/14/2013	MD	0.1	md speak with NLRB agent about claim and her need for witnesses 0.1
3/14/2013	MD	0.2	md/jp discussing intake for additional class member 0.2 MD/JP review facts provided by potential opt in, reviewed possibility of class rep and
3/14/2013	MD	0.4	reviewed follow up information needed for amended complaint telephone call to putative class member to discuss documents .1 email to putative class
3/14/2013	KW	0.3	member regarding documents .2
3/15/2013	MD	0.2	md/jp discussing legal arguments and facts to rebut outside sales exemption 0.2
3/15/2013	MD	0.3	md call w/ client about giving statement to NLRB 0.3
3/15/2013	JP	0.1	voice message in response to his request for info on case
3/15/2013	JP	0.1	message in response to his request for case info
3/15/2013	MD	0.2	md/dg discussing md call w/ NLRB agent including how to discuss the claim with client 0.2
3/15/2013	MD	0.1	md call NLRB attorney re date for client statement 0.1
3/15/2013	JP	0.5	intake on fact of hours worked for defendant
3/15/2013	JP	1.1	intake on facts of overtime and hours worked
3/15/2013	JP	0.2	md/jp discussing legal arguments and facts to rebut outside sales exemption 0.2
3/15/2013	CM	0.1	call from potential opt-in re questions re case (.1)
3/15/2013	JP	0.3	brief discussion on facts of how Kellogg treats employees

Date	Staff	Amount of Time	Description
3/15/2013	MA	0.5	Creating spreadsheet of current/former employees' names and addresses to use in mail merge as part of mining efforts
3/15/2013	MA	0.2	Stuffing envelopes with mining letter to send to potential class members
3/15/2013	MD	0.3	md reviewing documents provided by client 0.3
3/15/2013	MD	0.4	md call with Intake about email he received from management 0.4
3/15/2013	CLER	0.2	Mailing [ ] letter to potential clients [ ]
3/15/2013	DG	0.2	md/dg discussing md call w/ NLRB agent including how to discuss the claim with client 0.2
3/15/2013	MD	0.1	md organize/draft topics to cover with client interview with NLRB 0.1
3/15/2013	DG	0.2	md/jp evaluating intake from Nebraska regarding whether she is outside sales 0.2
3/15/2013	MD	0.2	md review intake notes for person from Nebraska 0.2
3/15/2013	MA	0.2	Running mail merge for mining letter to send to former Kellogg employees
3/15/2013	MD	0.2	md/jp evaluating intake from Nebraska regarding whether she is outside sales 0.2
3/18/2013	KW	0.2	prepare pdf response to request from NLRB
3/18/2013	JP	0.3	review and refine MD edits to intake outline
3/18/2013	KW	1.5	KW/JP Create intake information outline .8; Review case notes for current intakes to identify information needed to verify claims .5; Organize case files for efficient access to information for litigation team .2
3/18/2013	MD	0.1	md read letter from NLRB re case opening and procedures 0.1
3/18/2013	JP	0.8	review intake information.2; organize information into intake framework .3; assess information that supports claim .2; determine information that is still needed for claim .1
3/18/2013	JP	0.8	review intake information.2; organize information into intake framework .3; assess information that supports claim .2; determine information that is still needed for claim .1
3/18/2013	MD	0.2	md corresponding with client about email sent to class members 0.2
3/18/2013	KW	0.6	md/kw Review Kellogg file .3 discuss questions regarding intakes .1 determine organization of NLRB file for efficient use by litigation team .1 determine redaction needed of document requested by NLRB .1 discuss
3/18/2013	AG	2.8	conduct search of current/former employee (mining)
3/18/2013	CLER	0.1	create PDF format of correspondence from NLRB (Charge docketed)
3/18/2013	KW	0.1	update contact information file of NLRB Board agent
3/18/2013	JP	0.1	phone message for discussion of eligibility to join case
3/18/2013	MD	0.6	md/kw Review Kellogg file .3 discuss questions regarding intakes .1 determine organization of NLRB file for efficient use by litigation team .1 determine redaction needed of document requested by NLRB .1 discuss
3/18/2013	JP	0.1	phone message for discussion of eligibility to join case
3/18/2013	JP	0.1	voice message about statute of limitations if she wants to join case
3/18/2013	KW	0.4	update electronic docket of NLRB charge and response from NLRB .1 organize case files to incorporate correspondence, docket and data related to NLRB charge .3
3/18/2013	MD	0.1	md call w/ NLRB attorney re witnesses and documents. 0.1
3/18/2013	JP	0.3	jlp/kw review spreadsheet of intakes organize additional spreadsheet to track data for intakes discuss information needed to clarify claims of putative class members
3/18/2013	KW	0.3	jlp/kw review spreadsheet of intakes organize additional spreadsheet to track data for intakes discuss information needed to clarify claims of putative class members

Date	Staff	Amount of Time	Description
3/18/2013	JP	0.8	review intake information.2; organize information into intake framework .3; assess information that supports claim .2; determine information that is still needed for claim .1
3/18/2013	AG	0.1	MA/AG review how to search for Kellogg employees on linked in and Facebook as part of mining process
3/18/2013	JP	1.5	KW/JP Create intake information outline .8; Review case notes for current intakes to identify information needed to verify claims .5; Organize case files for efficient access to information for litigation team .2;
3/18/2013	MD	0.1	md review email from JP re intake outline and respond 0.1
3/18/2013	MA	0.1	MA/AG review how to search for Kellogg employees on linked in and Facebook as part of mining process
3/18/2013	MD	0.1	md correspond with client about providing statement to NLRB 0.1
3/18/2013	MD	0.2	MA/AG/MD discussion of process of locating former employees for mining purposes
3/18/2013	AG	0.2	MA/AG/MD discussion of process of locating former employees for mining purposes
3/18/2013	MA	0.2	MA/AG/MD discussion of process of locating former employees for mining purposes
3/18/2013	MD	0.2	md edit interview outline with other class members 0.2
3/19/2013	MD	0.6	md call w/ [client] about appearance before NLRB 0.6
3/19/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#16 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Teri Geier)(Dunn, Matt)
3/19/2013	MD	0.1	md read letter from defense counsel re website 0.1
3/19/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Teri Geier)
3/19/2013	KW	0.5	review notes from 1st conversation from putative class member .1 email information he requested .2 update case notes .1 update Intakes spreadsheet to be responsive to case inquiries .1
3/19/2013	AG	3.4	conduct search of current/former employee (mining)
3/19/2013	CLER	0.1	Data Entry of contact information of new client
3/19/2013	KW	0.5	prepare spreadsheet of data for putative class members to prepare for merge mailing
3/19/2013	CLER	0.1	Data Entry of contact information of opposing counsel
3/19/2013	MD	0.1	md provide responses to NLRB attorney's questions 0.1
3/19/2013	JP	0.3	jp/kw review Intake information form .2 make needed revisions .1
3/19/2013	KW	0.3	review data for putative class members .2 update spreadsheet.1
3/19/2013	DG	0.1	md/dg discussing dg conversation with defense counsel 0.1
3/19/2013	KW	1.3	Fact Finding Intake Interview 1.3
3/19/2013	MD	0.1	md/dg discussing dg conversation with defense counsel 0.1
3/19/2013	DG	0.1	md/dg discussing whether to postpone [client's] testimony with NLRB tomorrow 0.1
3/19/2013	KW	0.4	discussion with named plaintiff regarding appealing her unemployment denial and documentation needed
3/19/2013	KW	0.5	Intake interview with putative class member .3 open case contact .1 email consent to sue and information requested .1
3/19/2013	AG	0.2	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
3/19/2013	MD	0.1	md/dg discussing whether to postpone [client's] testimony with NLRB tomorrow 0.1
3/19/2013	MD	0.2	md prepare for call with client re interview with NLRB 0.2

Date	Staff	Amount of Time	Description
3/19/2013	CLER	0.2	prepare welcome ltrs to new client
3/19/2013	MD	0.2	dg/md/jp/kw- review potential state class actions to be filed review opt-ins to determine potential state class representatives review intake contacts to determine states represented and needed follow-up
3/19/2013	KW	0.3	jp/kw review Intake information form .2 make needed revisions .1
3/19/2013	DG	0.5	dg/md/jp/kw- review potential state class actions to be filed review opt-ins to determine potential state class representatives review intake contacts to determine states represented and needed follow-up .2; call from Jim Boudreau re initial issues with the case .3
3/20/2013	KW	0.1	telephone call to plaintiff to schedule interview with attorney regarding state class representation
3/20/2013	KW	0.2	read letter from Def. counsel regarding class communications .1 update electronic file of case correspondence for efficient access by litigation team .1
3/20/2013	MD	0.1	md/kw- discuss numerosity in MO; specific information needed form potential state class representative
3/20/2013	DG	0.5	review Kellogg's letter re alleged website misstatements .3; legal research re same .2
3/20/2013	KW	0.2	telephone call in response to putative class member's request for information about this case update case notes
3/20/2013	AG	2	conduct search of current/former employee (mining)
3/20/2013	KW	0.4	Revise draft of attorney advertising letter merge mail to putative class members
3/20/2013	KW	0.1	md/kw- discuss numerosity in MO; specific information needed form potential state class representative
3/20/2013	KW	1.1	fact finding intake interview 1.1
3/20/2013	KW	0.1	jp/kw revise wording of email to putative class members
3/20/2013	JP	0.1	jp/kw revise wording of email to putative class members
3/20/2013	JP	0.5	jp/kw review file of spreadsheets and data sent by opt-in [ ] to determine what is included, how it relates to claims and what needs explanation
3/20/2013	KW	0.5	jp/kw review file of spreadsheets and data sent by opt-in [ ] to determine what is included, how it relates to claims and what needs explanation
3/20/2013	MD	1.5	md internet researching for class members 1.5
3/20/2013	MD	0.5	md researching MO law for potential class action 0.5
3/20/2013	AG	0.1	md/ag/ma/kw review of web search engine Yatedo to identify putative class members for attorney advertising information
3/20/2013	MD	0.1	md/ag/ma/kw review of web search engine Yatedo to identify putative class members for attorney advertising information
3/20/2013	MA	0.1	md/ag/ma/kw review of web search engine Yatedo to identify putative class members for attorney advertising information
3/20/2013	JP	0.1	email to attorneys regarding referral for age discrimination concerns
3/20/2013	KW	0.2	telephone call to set up interview with putative class member.1 update case notes .1
3/20/2013	MD	0.1	md write defense counsel in response to time to discuss case 0.1
3/20/2013	KW	0.4	organize and save weekly schedules, route books and other electronic documents sent by opt-in
3/20/2013	MD	0.1	md/dg discussing client NLRB affidavit 0.1
3/20/2013	MD	2	md participate on telephone call with NLRB and [client] 2.0
3/20/2013	DG	0.1	md/dg discussing client NLRB affidavit 0.1
3/20/2013	MD	0.2	md prepare for call with NLRB and client 0.2
3/20/2013	MD	0.1	md email DG about speaking with defense counsel 0.1

Date	Staff	Amount of Time	Description
3/20/2013	MD	0.2	md reviewing clients documents 0.2
3/20/2013	KW	0.1	Open case contacts for new putative class member
3/20/2013	KW	0.3	Organize fact information received from opt-in .3
3/20/2013	MD	0.2	md reviewing intake notes from new client 0.2
3/20/2013	JP	1.5	discussion of hours worked, changes in pay practices over the claim period, discussion of end of employment issues.
3/20/2013	CLER	1	create PDF format of documents recd from client for discovery
3/20/2013	KW	0.1	md/ag/ma/kw review of web search engine Yatedo to identify putative class members for attorney advertising information
3/21/2013	KW	0.3	jlp/kw discuss intake information provided by putative class member who is current employee to further understand company job titles and recent changes
3/21/2013	DG	0.1	review terms of proposed corrective notice .1
3/21/2013	MD	0.3	md researching MO class actions and state overtime law 0.3
3/21/2013	MD	0.1	dg/md discuss advisability of working for agreed statement to class members to resolve ULP .1
3/21/2013	DG	0.1	dg/md discuss advisability of working for agreed statement to class members to resolve ULP .1
3/21/2013	JP	0.3	jlp/kw discuss intake information provided by putative class member who is current employee to further understand company job titles and recent changes
3/21/2013	KW	1.5	fact finding intake interview
3/21/2013	MD	0.1	md reviewing email from potential client and forwarding to paralegals to follow-up 0.1
3/21/2013	KW	0.4	organize fact and data so it is usable by litigation team in supporting claims email consent to sue and link to website
3/21/2013	MD	0.4	md draft MO Class action allegations 0.4
3/21/2013	MD	0.5	md editing confidentiality agreement 0.5
3/21/2013	MD	0.4	md drafting corrective notice email to class members 0.4
3/21/2013	MD	0.4	md review retainer and make edits for MO client 0.4
3/21/2013	KW	0.1	md/kw discussing kw intake of potential new client and need for additional facts 0.1
3/21/2013	KW	1.3	Intake Interview 1.3
3/21/2013	MD	0.2	md review intake notes on potential client in CA 0.2
3/21/2013	DG	0.2	md/dg discuss edits to proposed corrective notice in response to defense counsel request 0.2
3/21/2013	MD	0.1	md/kw discussing kw intake of potential new client and need for additional facts 0.1
3/21/2013	AG	0.1	md/ag discussing status of ag research on potential class members 0.1
3/21/2013	DG	0.1	review retainer for state class rep .1
3/21/2013	MD	0.1	md/ag discussing status of ag research on potential class members 0.1
3/21/2013	MD	0.2	md/dg discuss edits to proposed corrective notice in response to defense counsel request 0.2
3/21/2013	AG	3.2	conduct search of current/former employee (mining)
3/22/2013	MD	0.5	md researching administrative regs re overtime claims 0.5
3/22/2013	MD	0.2	md researching statute of limitations for overtime and wage payment claim 0.2
3/22/2013	MD	0.1	md write defense counsel with propose corrective notice 0.1
3/22/2013	CM	0.2	call from potential opt-in with questions re case (.2)
3/22/2013	MD	0.1	md respond to client's email about discrimination claim and management conference call about case 0.1
3/22/2013	MD	0.3	md researching coercive communications with class members 0.3
3/22/2013	MD	2	md researching KS state law for potential class action



Date	Staff	Amount of Time	Description
3/25/2013	KW	1.4	fact finding intake interview 1.1 open case contacts .1 organize information for access by litigation team .2
3/25/2013	KW	0.3	consents to sue received and filed .1 email to putative class member regarding filing her consent to sue .1 update case notes .1
3/25/2013	DG	0.1	prepare email to [ ] NLRB responding to her requests .1
3/25/2013	JP	0.1	email appointment time for intake
3/25/2013	JP	0.3	JP/KW review new intakes to determine follow-up needed .1 discuss additional information needed from opt-ins .1 Identify states and possible state class representatives for state class actions .1
3/25/2013	KW	0.2	telephone call to respond to enquiry and set up interview appointment
3/25/2013	KW	0.2	begin to process consent to sue for filing
3/25/2013	JP	1.4	fact finding intake interview
3/25/2013	KW	0.3	telephone call to respond to on line enquiry .1 email to set up fact finding interview appointment .1 update case contacts information .1
3/25/2013	JP	0.3	discussed being a state class rep
3/25/2013	KW	1.8	create excel spreadsheet of potential class members for merge mailing attorney advertising letter .5 process merge mailing1.3
3/25/2013	JP	0.3	review facts re concerns about age discrimination
3/25/2013	KW	0.3	JP/KW review new intakes to determine follow-up needed .1 discuss additional information needed from opt-ins .1 Identify states and possible state class representatives for state class actions .1
3/26/2013	KW	1.1	fact finding intake interview .8 open case contacts .1 organize and record information .2
3/26/2013	KW	0.2	respond to email from putative class member .1 update contact information .1
3/26/2013	DG	0.3	dg/ms discuss whether NLRB affidavit for Plaintiff needs revising .2; call to [client] re same .1
3/26/2013	JP	0.4	update spreadsheet to include new intake data
3/26/2013	JP	0.9	fact finding intake interview
3/26/2013	JP	0.8	fact finding intake interview .8;
3/26/2013	DG	0.3	review NLRB affidavit for Plaintiff being asked to sign .3
3/26/2013	KW	0.3	respond to email enquiries about how to join this lawsuit .1 open case contacts .1 email exchange to schedule fact finding intake interview appointment .1
3/26/2013	JP	0.2	jlp/kw review intakes information from fact finding interviews conducted yesterday .1 attempt to determine origin of a partial faxed consent to sue to .1
3/26/2013	KW	1.1	fact finding intake interview with putative class member .7 organize case information for updating case notes .2 update information in spreadsheet tracking intake contacts and data .1 email information to respond to his questions .1
3/26/2013	KW	0.3	review consent to sue form sent by putative class member .1 update contact information in case files .1 reach out to schedule intake interview .1
3/26/2013	JP	1.1	fact finding intake interview
3/26/2013	KW	0.2	jlp/kw review intakes information from fact finding interviews conducted yesterday .1 attempt to determine origin of a partial faxed consent to sue to .1
3/26/2013	KW	0.3	telephone call from putative class member who is concerned about possible retaliation if she joins this lawsuit .2 update case notes .1
3/26/2013	KW	0.1	respond to email from named plaintiff regarding following up on potential class members
3/26/2013	KW	0.1	draft email in response to enquiry regarding case information
3/26/2013	JP	1.3	fact finding intake interview 1.2; email cts and contact info .1



Date	Staff	Amount of Time	Description
			fact finding intake interview .7 organize information related to the claims in this case .1
3/26/2013	KW	1.2	update case notes .2 email response to putative class member's questions .2
3/26/2013	JP	0.3	revise state class retainer to make it more comprehensible
3/26/2013	DG	0.2	DG/JP discuss revisions to the state class retainer
3/26/2013	JP	1.3	fact finding intake interview
3/26/2013	JP	0.2	DG/JP discuss revisions to the state class retainer
3/26/2013	JP	1.2	fact finding intake interview
			telephone call from Putative class member regarding his claims, and concerns about
3/27/2013	KW	0.2	retaliation
3/27/2013	JP	0.1	email sent request severance letter to determine if he can join lawsuit
			add suggested edits and revisions to draft retainer of state class representatives to
3/27/2013	KW	0.2	facilitate understanding by a lay person
3/27/2013	JP	0.1	email consent to sue and follow up to intake email.
			create contact from consent to sue and transfer written explanation from fax cover sheet
3/27/2013	JP	0.2	to fact notes and intake notes
			jp/kw discuss TSR job classification and possible overtime violation for those workers
3/27/2013	JP	0.2	review case notes of opt-in [ ] for information related to TSR on position
3/27/2013	KW	0.1	update case notes regarding new job assignment and concerns about retaliation
			call to [cleint] re NLRB affidavit .4; re case update .; 1re unemployment .1; review facts re
3/27/2013	DG	0.8	unemployment .2
3/27/2013	KW	0.1	use Abby Fine Reader software to convert pdf to Word doc .1
			review draft of retainer for state class action representatives for purpose of determining
3/27/2013	KW	0.2	clarity
			jp/kw discuss possible revisions to draft retainer to facilitate understanding by lay
3/27/2013	JP	0.2	potential state class representatives
			telephone call to named plaintiff to accelerate production of needed documents .1
			review case notes to cull all information about unemployment issues .2 create
3/27/2013	KW	0.4	information memo for attorneys .1
			jp/kw discuss possible revisions to draft retainer to facilitate understanding by lay
3/27/2013	KW	0.2	potential state class representatives
3/28/2013	DG	0.1	dg/kw discussion of tasks to be completed before unemployment hearing on 4/2/13
3/28/2013	DG	0.3	dg/ma prepare video for Kellogg TMs and RSRs .3
3/28/2013	MS	0.2	review and comment on revised retainer
3/28/2013	MA	0.3	dg/ma prepare video for Kellogg TMs and RSRs .3
3/28/2013	MS	0.3	review and comment on NLRB statement wrt to communications issues
			Setting up video equipment in order to make video to inform putative class members
3/28/2013	MA	0.1	about case
			Taking down video equipment from video shoot in order to inform putative class
3/28/2013	MA	0.1	members about case
3/28/2013	KW	0.2	work on formatting retainer agreement to be emailed to state class representatives
3/28/2013	KW	0.1	dg/kw discussion of tasks to be completed before unemployment hearing on 4/2/13
			send email to named plaintiff regarding production of documents related to
3/28/2013	KW	0.1	unemployment

Date	Staff	Amount of Time	Description
3/28/2013	DG	1.6	dg/jp/kw revise and finalize retainer to be sent to state class representatives .4; further edits to same .2; review [client's] UI documents re OT work .4; review Washington UI standards .5; call to NLRB re changes to affidavit .1
3/28/2013	JP	0.4	dg/jp/kw revise and finalize retainer to be sent to state class representatives
3/28/2013	DG	0.2	dg/ma prepare video for putative class members re case .2
3/28/2013	JP	1.1	prepare & send state class retainers
3/28/2013	MA	0.2	dg/ma prepare video for putative class members re how to join case .2
3/28/2013	KW	0.4	review unemployment documents emailed to office by named plaintiff .2 add to electronic file .1 forward to D. Getman .1
3/28/2013	KW	0.4	dg/jp/kw revise and finalize retainer to be sent to state class representatives
3/28/2013	KW	0.1	telephone call to named plaintiff regarding documents needed to prepare for hearing scheduled for 4/2/13
3/28/2013	KW	0.2	telephone call from [client] regarding working hours and being forced to use a vacation day for a day he is required to work.2
3/28/2013	JP	0.8	fact finding intake interview, .7; email request for severance agreement .1
3/29/2013	JP	1	fact finding intake interview, .8; email client contact info .1; email attorney's questions from plaintiff .1
3/29/2013	DG	0.6	edit declaration to the board .5; email to client with instructions .1
3/29/2013	MR	0.4	read and detailed reply to para JP about methods for plaintiff who has emails on iPhone and needs to find way to share with us
3/29/2013	MA	0.3	Editing video about case to put on YouTube and GS website to inform putative class members about case
3/29/2013	DG	1.5	edit complaint re state class allegations 1.5
3/29/2013	DG	0.4	call from [ ] NLRB re ULP affidavit .4
3/29/2013	JP	0.8	fact finding intake interview
4/1/2013	AG	0.4	prepare Notice of Filing of Consent to Sue and Consent to Sues for filing
4/1/2013	DG	0.1	dg/ms discuss ethics of representing [client] in UIB hrg .1
4/1/2013	KW	0.4	telephone calls from putative class members regarding terminations and allegations of age discrimination
4/1/2013	MD	0.5	md researching state laws for statute of limitation issue and damages 0.5
4/1/2013	JP	0.1	email confirmation of receipt of documents
4/1/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kim Bergren, # (2) Consent to Sue of Ronald L. Custer Jr., # (3) Consent to Sue of Kelley R. Dye Jr., # (4) Consent to Sue of Arthur Garland, # (5) Consent to Sue of Timothy R. Tolan, # (6) Consent to Sue of Judy M. Welch)
4/1/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#17 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kim Bergren, # (2) Consent to Sue of Ronald L. Custer Jr., # (3) Consent to Sue of Kelley R. Dye Jr., # (4) Consent to Sue of Arthur Garland, # (5) Consent to Sue of Timothy R. Tolan, # (6) Consent to Sue of Judy M. Welch)(Dunn, Matt)
4/1/2013	MD	0.2	dg/md discussing impact of severance agreement on FLSA claims and follow up with defense counsel on issue 0.2
4/1/2013	MD	0.5	download, review and file severance documents
4/1/2013	JP	0.3	md call w/ intake with questions about Kellogg's car program 0.3
4/1/2013	MD	0.3	MD/KW discuss impact of severance agreement on plaintiffs' claim .1 discuss issues related to Kellogg car buying requirement and then class members being stuck with the car payment .2
4/1/2013	KW	0.2	md drafting email to defense counsel re severance agreement 0.2

Date	Staff	Amount of Time	Description
4/1/2013	MD	0.2	dg/md discussing impact of severance agreement on FLSA claims and follow up with defense counsel on issue 0.2
4/1/2013	DG	0.2	md/dg discussing terms of severance agreement and whether it waives FLSA claim 0.2
4/1/2013	DG	0.1	DG/MA review video update for website in order to make final edits before posting to website to inform putative class members of case
4/1/2013	KW	0.8	dg/md/jp/kw analyze and discuss components of the Kellogg severance agreement putative class members have signed or may sign to determine affect on FLSA rights, potential age discrimination claims .3 Discuss implications of Covenant Not to Sue clause .1 Discuss the possibility of plaintiffs having to return severance pay if they join this lawsuit .1 Discuss issue of Morning Foods staff having to purchase cars to maintain jobs and then being terminated and still having to pay for the car .1 Discussion of picture being presented through fact finding interviews of the negative effects of company FLSA violations on staff .2
4/1/2013	MD	0.3	md/jp/kw discuss statute of limitations for various states for which there are potential state class actions to determine in which states it makes sense to file a state class complaint .3
4/1/2013	KW	1.5	KW/JP: reviewed info on current plaintiffs and determined necessary follow up re claims against defendant .3; reviewed information provided by potential plaintiffs and assigned follow up tasks to staff .3; discussed severance agreement re FLSA rights and potential impact on plaintiffs and potential plaintiffs .3; reviewed plaintiff info for potential state class reps, .2; determined legal research needed and referred to attorney .2; update excel tracking sheets to facilitate access to information by the litigation team .2
4/1/2013	CLER	0.5	prepare welcome ltrs to new clients
4/1/2013	JP	0.4	create and begin to update client document spreadsheet to summarize all documents sent to firm for use by litigation team
4/1/2013	MS	0.2	e-mail of analysis of into professional rules for UE help in WA
4/1/2013	CLER	0.3	Data Entry of contact information of new clients
4/1/2013	MD	0.8	dg/md/jp/kw analyze and discuss components of the Kellogg severance agreement putative class members have signed or may sign to determine affect on FLSA rights, potential age discrimination claims .3 Discuss implications of Covenant Not to Sue clause .1 Discuss the possibility of plaintiffs having to return severance pay if they join this lawsuit .1 Discuss issue of Morning Foods staff having to purchase cars to maintain jobs and then being terminated and still having to pay for the car .1 Discussion of picture being presented through fact finding interviews of the negative effects of company FLSA violations on staff .2
4/1/2013	JP	0.8	dg/md/jp/kw analyze and discuss components of the Kellogg severance agreement putative class members have signed or may sign to determine affect on FLSA rights, potential age discrimination claims .3 Discuss implications of Covenant Not to Sue clause .1 Discuss the possibility of plaintiffs having to return severance pay if they join this lawsuit .1 Discuss issue of Morning Foods staff having to purchase cars to maintain jobs and then being terminated and still having to pay for the car .1 Discussion of picture being presented through fact finding interviews of the negative effects of company FLSA violations on staff .2

Date	Staff	Amount of Time	Description
			dg/md/jp/kw analyze and discuss components of the Kellogg severance agreement putative class members have signed or may sign to determine affect on FLSA rights, potential age discrimination claims .3 Discuss implications of Covenant Not to Sue clause .1 Discuss the possibility of plaintiffs having to return severance pay if they join this lawsuit .1 Discuss issue of Morning Foods staff having to purchase cars to maintain jobs and then being terminated and still having to pay for the car .1 Discussion of picture being presented through fact finding interviews of the negative effects of company FLSA violations on staff .2
4/1/2013	DG	0.8	violations on staff .2
4/1/2013	MS	0.1	dg/ms discuss ethics of representing [cleint] in UIB hrg .1
4/1/2013	DG	1.6	legal research on effect of severance agreement on FLSA and state law claims 1.6
4/1/2013	KW	0.7	fact finding intake interview .7
4/1/2013	MA	0.2	Editing final version of video for website in order to inform putative class members of case
4/1/2013	CLER	0.2	create PDF format of documents recd from client
4/1/2013	KW	0.3	MD/KW discuss impact of severance agreement on plaintiffs' claim .1 discuss issues related to Kellogg car buying requirement and then class members being stuck with the car payment .2
4/1/2013	MS	0.2	legal research into professional rules for UE help in WA
4/1/2013	JP	1.5	KW/JP: reviewed info on current plaintiffs and determined necessary follow up re claims against defendant .3; reviewed information provided by potential plaintiffs and assigned follow up tasks to staff .3; discussed severance agreement re FLSA rights and potential impact on plaintiffs and potential plaintiffs .3; reviewed plaintiff info for potential state class reps, .2; determined legal research needed and referred to attorney .2; update excel tracking sheets to facilitate access to information by the litigation team .2
4/1/2013	DG	0.1	DG/MA review video update for website in order to make final edits before posting to website to inform putative class members of case
4/1/2013	MD	0.2	md/dg discussing terms of severance agreement and whether it waives FLSA claim 0.2
4/2/2013	KW	0.2	telephone call to putative class member to follow-up regarding his questions about the lawsuit claims
4/2/2013	JP	0.4	jlp/kw discuss changes in Kellogg management and operations over the past 3 years that have so negatively impacted employees in order for us to better understand the claims in this lawsuit and how to represent plaintiffs claims
4/2/2013	KW	0.3	fact finding interview regarding which job titles are receiving offers of severance- .2 email to attorney re this information .1
4/2/2013	JP	0.1	follow-up email to ask further details of job titles and duties
4/2/2013	MD	0.3	md speak with client in preparation for unemployment hearing 0.3
4/2/2013	MD	2.5	md prepare for unemployment hearing 2.5
4/2/2013	KW	0.4	Review and organize case information related to putative class member who is still employed .2 update case files .1 update electronic file of documents received from class members for efficient access by litigation team .1
4/2/2013	MD	0.5	md attend/participate in unemployment hearing 0.5
4/2/2013	MD	0.1	md write defense counsel about severance agreement 0.1
4/2/2013	KW	0.1	fact finding email to putative class member
4/2/2013	MD	0.2	md respond to attorney re potential opt-ins 0.2
4/2/2013	MD	0.1	md respond to defense counsel email about severance agreement 0.1
4/2/2013	AG	3.1	conduct search of current/former employee (mining)

Date	Staff	Amount of Time	Description
4/2/2013	JP	0.9	fact finding intake interview .8; follow up email with consent to sue .1
4/2/2013	MD	0.1	md/kw discussing car reimbursement program and need for more information in order to evaluate how issue fits into case 0.1
4/2/2013	MD	0.2	md speak with client after unemployment hearing about how it went and potential outcomes 0.2
4/2/2013	JP	1.1	review documents to find definitions of different job titles to determine if we have included are relevant job titles.
4/2/2013	JP	0.8	fact finding intake interview .7; email cts .1
4/2/2013	MD	0.1	dg/md discuss issues re severance and waiver .1
4/2/2013	JP	0.7	fact finding intake interview .7
4/2/2013	DG	0.1	dg/md discuss issues re severance and waiver .1
4/2/2013	KW	0.2	send information email to putative class member .1 update case information .1
4/3/2013	KW	0.3	receive and scan severance agreement .2 respond to putative class member regarding severance agreement
4/3/2013	JP	0.1	md/jp discussing case that settled against Kellogg in California 0.1
4/3/2013	KW	0.4	review lengthy email regarding employment experiences and questions about possible claims from former Kellogg employee .1 confer with attorney regarding Indiana state law .1 draft and email response to questions .2
4/3/2013	KW	0.3	jp/kw discuss claims of a putative class member from California to determine if there are possible California state claims review information regarding severance release of claims
4/3/2013	MD	0.3	md researching cases against Kellogg in California 0.3
4/3/2013	MD	0.1	md/jp discussing case that settled against Kellogg in California 0.1
4/3/2013	JP	0.1	email follow up to intake conversation to find out if she has questions prior to joining the case
4/3/2013	KW	0.2	telephone call to follow-up on initial contact regarding joining this case .1 email consent to sue .1
4/3/2013	JP	0.3	call to local counsel's office to discuss referral of plaintiffs who may have age discrimination claims as well
4/3/2013	CLER	0.4	prepare mining mailings
4/3/2013	AG	2.3	conduct search of current/former employee (mining)
4/3/2013	KW	0.2	telephone call to follow-up on initial contact regarding joining this case .1 email consent to sue .1
4/3/2013	KW	0.2	telephone to follow-up on retainer questions .2
4/3/2013	JP	0.8	call to determine if CA employees of Kellogg are paid differently than other states and to determine if potential plaintiff would be a good state class rep.
4/3/2013	MD	0.2	reviewing attorney advertising letter 0.2
4/3/2013	KW	0.2	email to new opt-in to schedule fact finding interview .1 update case notes .1
4/3/2013	MD	0.4	md researching Oregon law re bringing class claims 0.4
4/3/2013	MD	0.5	md researching Indiana state law for wage and hour claims and statute of limitation based on intake from paralegal 0.5
4/3/2013	JP	0.2	called with second request for severance agreement
4/3/2013	JP	1.2	research documents that have names of contact people in the same job title and create list for further research for addresses to send advertising letter .9; draft advertising letter .3;
4/3/2013	MD	0.1	md responding to email from JP re impact of severance agreement 0.1
4/4/2013	KW	0.4	jlp/kw discussion of more effective ways to track reaching out to possible class members discussion of data on spreadsheet tracking email and letters mailed to reach out ot putative class members

Date	Staff	Amount of Time	Description
4/4/2013	MD	0.5	md/dg telephone conference with defense counsel about proper defendant, service, and severance agreement 0.5
4/4/2013	DG	0.1	md/dg discussing follow up steps/actions per conversation with defense counsel 0.1
4/4/2013	MD	0.1	md/dg discussing follow up steps/actions per conversation with defense counsel 0.1
4/4/2013	DG	0.5	md/dg telephone conference with defense counsel about proper defendant, service, and severance agreement 0.5
4/4/2013	MD	0.3	md/dg discussing topics to cover in conversation with defense counsel and moving case forward (including severance agreement, serving complaint, filing collective action motion) 0.3
4/4/2013	AG	0.2	prepare Notice of Filing of Consent to Sue and Consent to Sues for filing
4/4/2013	MD	0.2	md drafting email to defense counsel re severance agreement 0.2
4/4/2013	MD	0.3	md drafting email to defense counsel re severance agreement, including reviewing severance agreement to ensure proper language included 0.3
4/4/2013	MD	0.2	md/kw discuss status of putative class members to determine work needed .1 discuss states of current plaintiffs regarding possible state class actions .1
4/4/2013	KW	0.3	md/kw/jp discuss responses to retainers of potential state class representatives .1 discuss possible additional states to pursue state class actions .1 discuss timeframe to amend complaint and add state classes .1
4/4/2013	KW	0.9	draft mailing for our reach to putative class members process mailing of letters to putative class members
4/4/2013	KW	0.1	md/kw discussing follow up with client about severance agreement 0.1
4/4/2013	CLER	0.1	Data Entry of contact information of new client
4/4/2013	MD	0.1	md write defense counsel about moving meeting time 0.1
4/4/2013	JP	0.3	md/kw/jp discuss responses to retainers of potential state class representatives .1 discuss possible additional states to pursue state class actions .1 discuss timeframe to amend complaint and add state classes .1
4/4/2013	AG	0.2	prepare consent to sues for filing and email copy to co-counsel for filing
4/4/2013	MD	0.1	md/kw discussing follow up with client about severance agreement 0.1
4/4/2013	MD	0.3	md/kw/jp discuss responses to retainers of potential state class representatives .1 discuss possible additional states to pursue state class actions .1 discuss timeframe to amend complaint and add state classes .1
4/4/2013	CLER	0.2	prepare welcome letter to new client
4/4/2013	KW	0.2	Email to putative class member sending contact information for attorney who handles age discrimination cases
4/4/2013	CLER	0.1	Data Entry of contact information of new client
4/4/2013	MD	0.2	md outlining topics for conversation with defense counsel 0.2
4/4/2013	DG	0.3	md/dg discussing topics to cover in conversation with defense counsel and moving case forward (including severance agreement, serving complaint, filing collective action motion) 0.3
4/4/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Vito Viviano)(
4/4/2013	MD	0.3	md review severance agreement 0.3
4/4/2013	KW	0.2	md/kw discuss status of putative class members to determine work needed .1 discuss states of current plaintiffs regarding possible state class actions .1
4/4/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#18 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Vito Viviano)(Dunn, Matt)
4/4/2013	CLER	0.3	prepare mining mailings



Date	Staff	Amount of Time	Description
4/4/2013	MD	1.5	md editing collective action motion and drafting plaintiffs declaration 1.5
4/4/2013	AG	1.5	conduct search of current/former employee (mining)
			jlp/kw discussion of more effective ways to track reaching out to possible class members
			discussion of data on spreadsheet tracking email and letters mailed to reach out ot
4/4/2013	JP	0.4	putative class members
4/5/2013	AG	3	conduct search of current/former employee (mining)
4/5/2013	MD	0.4	md reviewing documents from clients for declaration for collective action motion 0.4
4/5/2013	AG	0.2	prepare documents for production to depts.
4/5/2013	MD	1	md editing declaration 1.0
			Transfer documents recd from ECF system to docket file and create file copy(Docket#19 - NOTICE of Appearance by attorney James M Nelson on behalf of Defendant Kellogg
4/5/2013	CLER	0.1	Company. (Nelson, James)
4/5/2013	MD	0.5	md editing declaration for collective action motion 0.5
4/8/2013	KW	0.1	telephone call to schedule fact finding interview
4/8/2013	AG	2.8	conduct search of current/former employee (mining)
4/8/2013	CLER	0.1	create PDF format of Initial Order from Office of Admin. Hearing
4/9/2013	MD	0.5	md review discovery and records to respond to MR questions about calculating damages
4/9/2013	MD	0.1	md write defense counsel about severance agreement 0.1
			telephone call and email from putative class member to verify receipt of consent to sue
4/9/2013	KW	0.3	.2 update case notes .1
4/9/2013	AG	0.2	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
			draft letter explaining consent to sue mail letter, consent to sue and return envelope to
4/9/2013	KW	0.3	putative class member
			draft email explaining consent to sue send email, consent to sue to putative class
4/9/2013	KW	0.3	member update case notes to reflect contacts
			Transfer documents recd from ECF system to docket file and create file copy(Docket#50 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
4/9/2013	CLER	0.1	Consent to Sue of Steven Feiles)(Dunn, Matt)
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
4/9/2013	AG	0.2	Steven Feiles)
			draft email explaining consent to sue send email, consent to sue to putative class
4/9/2013	KW	0.3	member update case notes to reflect contacts
			draft email explaining consent to sue send email, consent to sue to putative class
4/9/2013	KW	0.3	member update case notes to reflect contacts
4/9/2013	AG	3.8	conduct search of current/former employee (mining)
			draft email explaining consent to sue send email, consent to sue to putative class
4/9/2013	KW	0.3	member update case notes to reflect contacts
4/9/2013	MA	0.2	Uploading informational video to YouTube to inform putative class members of case
			draft letter explaining consent to sue mail letter, consent to sue and return envelope to
4/9/2013	KW	0.3	putative class member
4/9/2013	CLER	0.1	Data Entry of contact information of new client
4/9/2013	CLER	0.2	prepare welcome letter to new client
4/9/2013	DG	0.1	review Boudreau's corrective notice re personal info sharing for NLRB .1
4/10/2013	DG	0.1	review def email re severance agreement not waiving FLSA claim .1
			md/dg discussing response to defense counsel concerning the corrective email for NLRB
4/10/2013	MD	0.2	claim 0.2
4/10/2013	MD	0.5	md drafting and editing declaration for collective action motion 05



Date	Staff	Amount of Time	Description
4/10/2013	DG	0.3	md/dg discussing response to defense counsel concerning the corrective email for NLRB claim 0.2; review and edit corrective statement re same .1
4/10/2013	MD	0.3	md review email from defense counsel re corrective notice and review/edit proposed curative email 0.3
4/10/2013	KW	0.4	jp/kw discuss facts of California intake regarding hourly pay compensation and salary pay compensation .2 discuss potential California class .1 Determine tasks going forward to follow-up on intakes and potential state class representatives .1
4/10/2013	AG	2.5	conduct search of current/former employee (mining)
4/10/2013	MD	0.2	md speak with NLRB attorney re corrective notice 0.2
4/10/2013	MA	0.2	Posting copy of YouTube video to G&S case website to inform putative class members of case claims
4/10/2013	MD	0.2	md edit and send defense counsel email about corrective notice 0.2
4/10/2013	JP	0.4	jp/kw discuss facts of California intakes regarding hourly pay compensation and salary pay compensation .2 discuss potential California class .1 Determine tasks going forward to follow-up on intakes and potential state class representatives .1
4/10/2013	MD	0.2	md draft email to defense counsel re curative email 0.2
4/11/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#21 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of John Weisser, # (2) Consent to Sue of David R. Rink)(Dunn, Matt)
4/11/2013	JP	0.2	client called for referral information for age discrimination investigation
4/11/2013	KW	0.1	md/kw confer regarding concerns related to joining this lawsuit of putative class member process consent to sue for filing .1 open case contacts for new opt-in .1 email
4/11/2013	KW	0.3	information to paralegal for intake interview .1
4/11/2013	JP	1.4	fact finding intake interview, 1.3; email to client with contact info .1
4/11/2013	MD	0.1	md/kw confer regarding concerns related to joining this lawsuit of putative class member
4/11/2013	KW	0.3	process consent to sue for filing .1 update case notes with intake information .2
4/11/2013	MD	0.1	md respond to jp email about class action claim and client in MN 0.1
4/11/2013	KW	0.2	intake telephone call from putative class member with concerns about document he signed when he left kellogg's employ
4/11/2013	KW	0.3	telephone call from putative class member with questions about impact of joining this case on his previous agreements with this company
4/11/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#22 - MOTION for Variance From Local Civil Rule 83.1(D) in Connection with the Application for Leave to Appear Pro Hac Vice of James Boudreau by Defendant Keebler Company. (Attachments: # (1) Proposed Order Granting Motion For Variance) Noting Date 4/26/2013, (Nelson, James)
4/11/2013	KW	0.1	open case contact for new putative class member
4/11/2013	MD	0.2	md speak with intake about non-disparagement clause and ability to participate in case 0.2
4/11/2013	MD	0.2	md/dg discuss filing flsa claims for employees who signed a severance agreement 0.2
4/11/2013	MD	0.5	md research MN state of law and ability to bring state class action 0.5
4/11/2013	MD	0.2	md draft response to defense counsel concerning corrective notice 0.2

Date	Staff	Amount of Time	Description
4/11/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of John Weisser, # (2) Consent to Sue of David R. Rink)
4/11/2013	JP	0.1	email request breakdown by duties of hours spent as a TM to determine if he can be a Minnesota state class rep
4/11/2013	MD	0.2	md/jp discussing differences between TMs and RSRs and interplay between the two for conditional certification of collective action motion 0.2
4/11/2013	MD	0.1	md review defendant's representation about severance agreement 0.1
4/11/2013	JP	3.9	naming, reviewing, and indexing documents for ease of access for litigation team 2.1; editing draft declaration for [plaintiff], .9; researching thru all documents to understand changes in job titles and job duties for collective action motion. .9
4/11/2013	DG	0.2	md/dg discuss filing flsa claims for employees who signed a severance agreement 0.2
4/11/2013	AG	0.2	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
4/11/2013	CLER	0.2	Data Entry of contact information of new clients
4/11/2013	CLER	0.3	prepare welcome ltr to new clients
4/11/2013	JP	0.2	md/jp discussing differences between TMs and RSRs and interplay between the two for conditional certification of collective action motion 0.2
4/12/2013	CLER	0.1	Data Entry of contact information of new client
4/12/2013	MD	0.2	MD/JP discuss state class rep issues for Minnesota and Illinois
4/12/2013	MD	0.1	MD/JP discuss threshold for a collective action with different facts of off the clock work from different intake reps.
4/12/2013	JP	0.1	dg/jp discuss status of new optins and severance .1
4/12/2013	MD	0.2	md call with intake with question about filing consent to sue and vacation pay payout 0.2
4/12/2013	AG	0.2	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
4/12/2013	MD	0.1	md follow up with DG about response to defense counsel re corrective notice 0.1
4/12/2013	DG	0.6	review intake's question about non-disparagement and filing consent to sue .1; draft statement re severance and joining case for website .5
4/12/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#23 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Teresa Maxwell)(Dunn, Matt)
4/12/2013	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Teresa Maxwell)
4/12/2013	DG	0.1	dg/jp discuss status of new optins and severance .1
4/12/2013	JP	0.1	MD/JP discuss threshold for a collective action with different facts of off the clock work from different intake reps.
4/12/2013	JP	0.2	MD/JP discuss state class rep issues for Minnesota and Illinois
4/12/2013	CLER	0.1	Data Entry of contact information of new client
4/12/2013	CLER	0.2	prepare welcome ltr to new client
4/15/2013	KW	0.9	fact finding intake interview .7 organize individual information .1 add to case notes .1
4/15/2013	KW	0.3	telephone respond to email request for information from putative class member .1 email explanation and consent to sue form.2
4/15/2013	AG	0.3	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
4/15/2013	KW	0.9	compare spreadsheets of previous mailings to eliminate duplications with previous mailings .4 prepare spreadsheet for attorney advertising letter .2 prepare attorney advertising letter .2 merge mail to potential class members.1

Date	Staff	Amount of Time	Description
4/15/2013	KW	0.6	review files of opt-ins .2 create spreadsheet to track opt-ins plaintiff information .4
4/15/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#24 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Alfonso Burciaga, # (2) Consent to Sue of Eleazar Jimenez, # (3) Consent to Sue of Joh Van Hoey)(Dunn, Matt)
4/15/2013	CLER	0.5	prepare mining mailing
4/15/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Alfonso Burciaga, # (2) Consent to Sue of Eleazar Jimenez, # (3) Consent to Sue of Joh Van Hoey)
4/15/2013	KW	0.5	process merge mail for attorney advertising- fold letters stuff envelopes
4/15/2013	KW	0.2	telephone call from putative class member regarding concerns about retaliation if she joins this lawsuit
4/15/2013	CLER	0.3	scan severance agreement faxed by putative class member .1 update electronic file of intake documents .1 email link to website, consent form and information related to severance agreements to putative class member .1
4/15/2013	CLER	0.3	Data Entry of contact information of new clients
4/16/2013	MD	0.5	md reviewing and editing collective action declaration 0.5
4/16/2013	MD	0.5	md review TN law for class action 0.5
4/16/2013	MD	0.1	md write dg re corrective notice to class members 0.1
4/16/2013	CLER	0.2	Data Entry of contact information of new client
4/16/2013	AG	0.4	conduct search of current/former employee (mining)
4/16/2013	CLER	0.2	prepare welcome ltr to new client
4/16/2013	CLER	0.2	prepare welcome ltr to new client
4/16/2013	CLER	0.1	Data Entry of contact information of new client
4/16/2013	KW	0.5	fact finding intake interview with putative class member who is concerned about retaliation if she joins this lawsuit .3 open case contact .1 record information .1
4/16/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#25 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Samuel L. Parker JR., # (2) Consent to Sue of Jodi Ignowski)(Dunn, Matt)
4/16/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Samuel L. Parker JR., # (2) Consent to Sue of Jodi Ignowski)
4/16/2013	KW	0.1	receive, print and copy consent to sue to prepare for filing
4/16/2013	KW	0.6	fact finding telephone interview with putative class member .3 open case contact .1 record information .1 update spreadsheet to track intakes contacts for efficient access to information by litigation team .1
4/16/2013	AG	0.3	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
4/16/2013	KW	0.3	review collective action declaration add edits and suggestions
4/17/2013	KW	0.3	draft email to putative class member regarding retaliation concerns and sharing information about this case .2 email website link and consent to sue form .1
4/17/2013	MD	0.5	MD/KW/JP discussed research of state class laws to determine which states are favorable to state class actions .2 reviewed client list to determine which states we have representation and numerosity .2 assigned tasks for research and sending out state class retainers.1

Date	Staff	Amount of Time	Description
			MD/KW/JP discussed research of state class laws to determine which states are favorable to state class actions .2 reviewed client list to determine which states we have representation and numerosity .2 assigned tasks for research and sending out state class
4/17/2013	KW	0.5	retainers.1
4/17/2013	AG	0.9	conduct search of current/former employee (mining)
4/17/2013	JP	0.7	fact finding intake interview
4/17/2013	MD	0.2	md/dg discussing edits to corrective notice 0.2
			prepare attorney advertising merge mailing to acquaint potential plaintiff with case
4/17/2013	KW	0.5	inforamtion
4/17/2013	DG	0.2	edit statement to def re NLRB corrective notice .2
			MD/KW/JP discussed research of state class laws to determine which states are favorable to state class actions .2 reviewed client list to determine which states we have representation and numerosity .2 assigned tasks for research and sending out state class
4/17/2013	JP	0.5	retainers.1
4/17/2013	DG	0.2	md/dg discussing edits to corrective notice 0.2
4/17/2013	MD	0.3	md email response to defense counsel re corrective notice 0.3
4/18/2013	KW	0.2	review electronic folder of potential plaintiffs to detemine contacts to be made
4/18/2013	MD	1.7	md researching state law claims for class action 1.7
4/18/2013	KW	0.2	telephone call from potential class member .1 open case contact .1
			jlp/kw determine most effective way to organize and track data and contacts related to potential opt-ins--to be sure to meet ethical standards related to attorney advertising
4/18/2013	KW	0.3	and respond to claims of potential plaintiffs
			jlp/kw determine most effective way to organize and track data and contacts related to potential opt-ins--to be sure to meet ethical standards related to attorney advertising
4/18/2013	JP	0.3	and respond to claims of potential plaintiffs
4/19/2013	DG	0.1	md/dg discussing dg's status of reviewing/editing declaration 0.1
4/19/2013	MD	0.1	md/dg discussing dg's status of reviewing/editing declaration 0.1
4/19/2013	MD	0.2	md review and edit collective action declaration 0.2
4/22/2013	JP	0.1	jlp/kw -review latest intakes to determine tasks needing attention
4/22/2013	KW	0.1	jlp/kw -review latest intakes to determine tasks needing attention
4/22/2013	CLER	0.2	prepare welcome ltr to new client
4/22/2013	AG	0.3	prepare Notice of Filing of Consent to Sue and Consent to Sue for filing
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
4/22/2013	AG	0.2	Robert D. Gibson)
4/22/2013	CLER	0.1	Data Entry of contact information of new client
			Transfer documents recd from ECF system to docket file and create file copy(Docket#26 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
4/22/2013	CLER	0.1	Consent to Sue of Robert D. Gibson)(Dunn, Matt)
4/22/2013	CM	0.1	call from potential optin with questions re case (.1)
4/22/2013	DG	0.1	review defs proposal re settlement of NLRB charge .1
4/22/2013	DG	0.2	dg/jp discuss amending collective action definition to include all appropriate job titles .2
4/22/2013	JP	0.2	dg/jp discuss amending collective action definition to include all appropriate job titles .2
4/22/2013	DG	0.2	dg/jp discuss how to frame collective class definition .2
			fact finding intake interview .5 open new case contact .1 organize and record
4/22/2013	KW	0.7	information in electronic file .1
4/22/2013	MD	0.2	dg/md discuss conditions to dropping certain defendants from claims to send to def .2

Date	Staff	Amount of Time	Description
4/22/2013	DG	0.4	dg/md discuss conditions to dropping certain defendants from claims to send to def .2; edit collective action definition .2
4/22/2013	MD	0.1	dg/md discuss whether to serve complaint for collective action motion .1
4/22/2013	KW	0.7	fact finding intake interview .5 open new case contact .1 organize information for access by litigation team .1
4/22/2013	JP	0.2	dg/jp discuss how to frame collective class definition .2
4/22/2013	DG	0.1	dg/md discuss whether to serve complaint for collective action motion .1
4/22/2013	KW	0.2	contact from putative class member .1 open case contact in electronic file .1
4/23/2013	MD	0.3	md draft/edit email to defense counsel re amending complaint 0.3
4/23/2013	MD	0.3	md drafting response to defense counsel re curative email and research caselaw prohibiting employees from sharing personal information of other employees under the NLRA 0.3
4/23/2013	DG	0.1	dg/kw confer regarding recent consents filed and state class issues for people who have signed a severance agreement
4/23/2013	KW	0.4	telephone call from putative class member regarding case development, fear of retaliation if he joins and possible age discrimination update case notes .1
4/23/2013	MD	0.2	md draft response to defense counsel's email re amending complaint 0.2
4/23/2013	KW	0.1	dg/kw confer regarding recent consents filed and state class issues for people who have signed a severance agreement
4/23/2013	JP	0.4	md/jp/kw confer to determine research required to proceed with filing state class claims .4
4/23/2013	MD	0.4	md/jp/kw confer to determine research required to proceed with filing state class claims .4
4/23/2013	KW	1.1	jp/kw review intakes spreadsheet and information to determine information gathered and information still needed review plaintiffs' information to determine information needed to proceed with state class claims organize new data
4/23/2013	MA	0.1	Call from intake [client] to confirm receipt of consent to sue
4/23/2013	KW	0.4	md/jp/kw confer to determine research required to proceed with filing state class claims .4
4/23/2013	MD	0.7	dg/md/jp/kw determine how to proceed with state class actions for plaintiffs who have signed severance agreements
4/23/2013	MD	2.0	md researching state laws for class actions 2.0
4/23/2013	DG	0.1	review potential agreement re proper defendants .1
4/23/2013	KW	0.2	Review wording to describe job titles for declaration to support collective action motion- .1 add suggestions and edits .1
4/23/2013	MD	0.2	md/dg discussing argument to make in response to defense counsel's proposed curative email to resolve NLRB charge 0.2
4/23/2013	DG	0.2	review proposed stip re proper defendants .1; review NLRB stip proposed .1
4/23/2013	DG	0.2	md/dg discussing argument to make in response to defense counsel's proposed curative email to resolve NLRB charge 0.2
4/23/2013	JP	1.1	jp/kw review intakes spreadsheet and information to determine information gathered and information still needed review plaintiffs' information to determine information needed to proceed with state class claims organize new data
4/23/2013	KW	0.8	fact finding intake interview .7 add information to case notes .1
4/24/2013	KW	1.1	fact finding intake interview with putative class member .8 open case contact .1 organize and record information.1 add information to spreadsheet tracking intakes .1

Date	Staff	Amount of Time	Description
			md/kw discuss need for NY state class representative who has not signed severance
4/24/2013	MD	0.1	agreement discuss alleged Kellogg attorney contact re this case with employees
4/24/2013	MD	0.1	md respond to defense counsel re edits to curative notice 0.1
4/24/2013	AG	0.4	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
4/24/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#27 -
			md researching NY, MI, and IL law on waiver of state claims based on severance
4/24/2013	MD	1.5	agreements 1.5
			ECF filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Laura J. Wisby, # (2) Consent to Sue of Glen R. Sullivan, # (3) Consent to Sue of Brad Murphey, # (4) Consent to Sue of Katherine
4/24/2013	AG	0.2	Bennett)
4/24/2013	CLER	0.3	Data Entry of contact information of new clients
4/24/2013	MD	0.1	md edit email to defense counsel re dismissal of defendants 0.1
			review proposed response re NLRB charge to def settlement proposal .1; review defs
4/24/2013	DG	0.2	newest proposal for NLRB resolution .1
			jlp/kw review intakes spreadsheet to determine results of contacts made determine
4/24/2013	JP	0.4	contacts to be made determine who will follow-up with ech putative class member
			md/kw discuss need for NY state class representative who has not signed severance
4/24/2013	KW	0.1	agreement discuss alleged Kellogg attorney contact re this case with employees
4/24/2013	CLER	0.4	prepare welcome ltr to new clients
			md read email from client and respond about defense counsel seeking statements from
4/26/2013	MD	0.2	TMs 0.2
4/26/2013	MD	0.1	md review email from defense counsel 0.1
4/26/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
			Transfer documents recd from ECF system to docket file and create file copy(Docket#28 -
			CORPORATE DISCLOSURE STATEMENT Filed pursuant to Fed.R.Civ.P 7.1. Filed by
4/26/2013	CLER	0.1	Defendants Kellogg Company, Kellogg Sales Company. (Nelson, James)
4/26/2013	CLER	0.2	prepare welcome ltr to new client
4/26/2013	CLER	0.1	Data Entry of contact information of new client
			Transfer documents recd from ECF system to docket file and create file copy(Docket#29 -
			NOTICE of Withdrawal of Consent to Sue of Kim Bergren ; filed by Plaintiff PattyThomas.
4/26/2013	CLER	0.1	(Dunn, Matt)
4/26/2013	MD	0.1	md send email to defense counsel about accepting service 0.
			ECF Filing of NOTICE of Filing of Consent to Sue of Chad Johnson (Attachments: # (1)
4/26/2013	AG	0.01	Consent to Sue of Chad Johnson)(
4/26/2013	AG	0.1	ECF Filing of NOTICE of Withdrawal of Consent to Sue of Kim Bergren
			Transfer documents recd from ECF system to docket file and create file copy(Docket#30 -
			NOTICE of Filing of Consent to Sue of Chad Johnson ; filed by Plaintiff Patty Thomas.
4/26/2013	CLER	0.1	(Attachments: # (1) Consent to Sue of Chad Johnson)(Dunn, Matt)
4/26/2013	MD	0.2	md edit opt-out form 0.2
4/29/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
			ECF Filing of NOTICE of Filing of Consent to Sue. (Attachments: # (1) Consent to Sue of
4/29/2013	AG	0.2	Paul Scafede)
4/29/2013	CLER	0.1	Data Entry of contact information of new client



Date	Staff	Amount of Time	Description
4/29/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#31 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Paul Scafede)(Getman, Dan)
4/29/2013	JP	0.5	called to discuss declaration .3; disussed fact that Kelloggs are pulling people in to give statements of some sort and the update on the Kellogg employee who killed himself. .2
4/29/2013	CLER	0.2	prepare welcome ltr to new client
4/29/2013	JP	0.1	message to call re friend who was still employeeed and instructed to not call [client]
4/29/2013	JP	0.5	fact finding intake discussion and discussion of state numerosity
4/29/2013	JP	1.2	create exhibits for declaration, .6 include exhibit info in declaration, .3 proof declaration for final copy .3
4/30/2013	KW	0.3	review of consents to sue filed and consents needing to be filed .1 discussion with plaintiff regarding filing consent .2
4/30/2013	KW	0.3	jlp/kw review plaintiff's communications to determine follow-up contacts needed .1 telephone call to plaintiff regarding her expressed interest in being state class representative .1 update case notes .1
4/30/2013	JP	0.5	review & incorporate client's written comments in collective action declaration
4/30/2013	JP	1.1	talk on the phone with client about remaining issues on declaration .5; incorporate facts we discussed into the declaration .6
4/30/2013	JP	0.1	jlp/kw review plaintiff's communications to determine follow-up contacts needed .1
4/30/2013	DG	0.2	edit [client] class declaration .2
4/30/2013	KW	0.3	review emails regarding details of severance agreement and former employees freedom to join this cae organize and archive for future reference
4/30/2013	MD	0.1	md review comments on declaration 0.1
4/30/2013	CLER	0.2	prepare welcome ltr to new client
4/30/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Kelly Kivett)
4/30/2013	KW	0.6	review filed of consents to sue filed to verify case files and information databases .4 update spreadsheet of plaintiff's information and individual notes .2
4/30/2013	CLER	0.1	Data Entry of contact information of new client
4/30/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
4/30/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#32 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kelly Kivett)(Dunn, Matt)
5/1/2013	CLER	0.1	Data Entry of contact information new client
5/1/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#33 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Delipe M. Bans III)(Dunn, Matt)
5/1/2013	CLER	0.2	prepare welcome ltr to new client
5/1/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Delipe M. Bans III)
5/1/2013	JP	0.1	left voice mail request for her to contact us for fact finding discussion
5/1/2013	MD	0.1	md/jp discussing finalizing declaration for named plaintiff 0.1
5/1/2013	DG	0.1	review exhibit to [client] declaration for collective action motion .1
5/1/2013	JP	0.1	scheduled an intake appointment with new plaintiff
5/1/2013	KW	0.2	telephone call from plaintiff regarding dcoument preservation information .1 remail document preservation letter to plaintiff .1



Date	Staff	Amount of Time	Description
5/1/2013	JP	0.1	respond to email about concerns about retaliation
5/1/2013	JP	0.5	fact finding intake discussion .4; email consent to sue and contact information .1
5/1/2013	JP	0.1	DG/JP reviewed format issues of Thomas collective action declaration
5/1/2013	JP	0.6	jlp/kw- work on revising state class representative retainer to clarify information .7
5/1/2013	KW	0.6	jlp/kw- work on revising state class representative retainer to clarify information .7
5/1/2013	JP	0.7	fact finding intake call .6; email consent to sue and website link .1
5/1/2013	MD	0.2	md review and edit [client] declaration 0.2
5/1/2013	DG	0.1	DG/JP reviewed format issues of [client] collective action declaration
5/1/2013	JP	0.1	md/jp discussing finalizing declaration for named plaintiff 0.1
5/1/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing fact finding intake interview, .6 email consent and contact info .1 email to case
5/2/2013	JP	0.8	attorneys about relevant new fact about defendants' policy .1
5/2/2013	MS	0.4	dg/ms discuss retainer terms for class reps .4
5/2/2013	DG	0.4	dg/ms discuss retainer terms for class reps .4 [incl research on ethical rules .2]
5/2/2013	DG	0.5	draft class representative retainer agreement .5 fact finding intake interview and answered questions about lawsuit .5 email consent and
5/2/2013	JP	0.6	contact info .1
5/2/2013	JP	0.1	update client list
5/2/2013	DG	0.5	final edit to class retainer agreement .5 DG/JP discuss draft changes to state class retainer .1 discuss final declaration regarding
5/2/2013	DG	0.2	whether to include a document exhibit .1 DG/JP discuss draft changes to state class retainer .1 discuss final declaration regarding
5/2/2013	JP	0.2	whether to include a document exhibit .1 fact finding interview about job duties in California and past lawsuits with Kellogg .4;
5/2/2013	JP	0.5	email contact informaton and request for documentation about past lawsuits .1
5/2/2013	CLER	0.1	Data Entry of contact information new client
5/2/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/2/2013	CLER	0.2	prepare welcome ltr to new client
5/2/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Stephanie M. Ater)
5/2/2013	CLER	0.1	Consent to Sue of Stephanie M. Ater)(Dunn, Matt Transfer documents recd from ECF system to docket file and create file copy(Docket#34 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
5/3/2013	CLER	0.1	signed by Judge Ronald B. Leighton.(DN)
5/3/2013	JP	0.4	fact finding interview .3 email consent to sue and contact info .1 memo to case attorneys listing some of the facts about the job duites that might impact
5/3/2013	JP	0.4	litigation strategy
5/3/2013	CLER	0.2	create PDF format of docs recd from clients
5/3/2013	JP	0.1	voice message left in response to his request for case information
5/3/2013	JP	1.1	fact finding intake conversation 1.0 email consent to sue and contact info .1 recieved, reviewed and filed faxed documents .2; DG/JP discussed documents and how
5/3/2013	JP	0.7	to advise client .1 called and shared attorney interpretation of documents .4
5/3/2013	DG	0.7	DG/JP discussed documents and how to advise client .1

Date	Staff	Amount of Time	Description
5/6/2013	DG	0.6	NLRB call from SMerritt at board re status of charge .2; draft email to Boudreau re terms of agreement to withdraw charge .3; conditionally withdraw charge .1
5/6/2013	JP	0.2	review issues for discussion with attorneys
5/6/2013	DG	0.1	dg/md discuss terms of NLRB charge withdrawal .1
5/6/2013	MD	0.1	dg/md discuss terms of NLRB charge withdrawal .1
5/6/2013	CLER	0.2	prepare welcome ltr to new client
5/6/2013	CLER	0.1	Data Entry of contact information new client
5/6/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/6/2013	JP	0.4	fact finding intake interview .3 email link and contact information.1
5/6/2013	JP	0.5	fact finding intake discussion
5/6/2013	MD	0.1	md review dg response to defense counsel re withdrawal of NLRB charge 0.1
5/6/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#36 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Karin S. Hudgins)(Dunn, Matt)
5/6/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Karin S. Hudgins)(
5/6/2013	JP	0.2	email in response to questions about lawsuit and setting up an intake appoinmtent
5/7/2013	MD	1	dg/jp/md litigation team meeting re scheduling of tasks for collective action motion .3; motion to amend .3; applicable job descriptions .4
5/7/2013	JP	1	dg/jp/md litigation team meeting re scheduling of tasks for collective action motion .3; motion to amend .3; applicable job descriptions .4
5/7/2013	CLER	0.1	Data Entry of contact information of new client
5/7/2013	JP	0.1	review and file faxed job duties document
5/7/2013	JP	0.2	voice message in response to email re being fired, concern about retaliaton .1 voice message in response to email (she cannont call out on her phone) .1
5/7/2013	JP	1.1	client terminated, called to discuss her perception that it is retaliation for joining the lawsuit
5/7/2013	DG	1	dg/jp/md litigation team meeting re scheduling of tasks for collective action motion .3; motion to amend .3; applicable job descriptions .4
5/7/2013	JP	0.8	fact finding intake interview
5/7/2013	JP	0.4	potential plaintiff called to update on his status with Kellogg and to ask questions about the case
5/7/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#37 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Shannon Pruitt)(Dunn, Matt)
5/7/2013	CLER	0.2	prepare welcome ltr to new client
5/7/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/7/2013	CLER	0.1	Data Entry of contact information of new client
5/7/2013	AG	1	conduct legal research on class action-Murray v. Kellogg Sales
5/7/2013	JP	0.3	called to discuss filing of his consent to sue, in last contact he was going to wait until he vests at 5 years.
5/7/2013	JP	0.1	voice message that I am calling for an intake.
5/7/2013	JP	2.1	Create fact note summary document for litigation team, to include facts from any intake or plaintiff relevant to the case
5/7/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Shannon Pruitt)
5/8/2013	MD	0.2	MD/JP discuss possible retaliatory firing of just filed plaintiff
5/8/2013	JP	0.2	MD/JP discuss possible retaliatory firing of just filed plaintiff
5/8/2013	JP	0.8	fact finding intake discussion

Date	Staff	Amount of Time	Description
5/8/2013	JP	0.3	called to discuss retaliatory firing of friend and to discuss job duties of RSM position
5/8/2013	DG	0.3	DG/JP discuss client's claim of retaliation
5/8/2013	JP	0.1	update fact summary sheet for litigation team
5/8/2013	JP	0.3	DG/JP discuss client's claim of retaliation
5/8/2013	JP	0.6	complete final draft of declaration and send to plaintiff for signature
5/8/2013	JP	0.8	fact finding intake interview
5/8/2013	JP	0.5	review process for getting declarations and state class retainers to opt in plaintiffs:
5/8/2013	JP	0.1	CM/JP discuss proper format for the declaration
5/8/2013	CM	0.1	CM/JP discuss proper format for the declaration
5/8/2013	JP	0.1	called and left voice message for intake in response to her message
			drafted collective action declaration based on facts from initial interview .8 phone and
5/9/2013	JP	0.9	email messages for client to call to complete declaration .1
5/9/2013	JP	0.2	update fact notes summary page
5/9/2013	JP	0.5	prepare .3 and email state class retainer with instructions .2
			review facts of employment to determine if he would be a good state class rep. .2;
			emailed request for info on numerosity in MN and if the numbers were ok would he be a
5/9/2013	JP	0.3	state class rep and if he would do a collective action declaration .1
			Transfer documents recd from ECF system to docket file and create file copy(Docket#38 - APPLICATION OF ATTORNEY James N. Boudreau FOR LEAVE TO APPEAR PRO HAC VICE for Defendants Keebler Company, Keebler Foods Company, Keebler Holding Corp, Kellogg Company, Kellogg Sales Company, Kellogg USA Inc (Fee Paid) Receipt No. 0981-3202198.
5/9/2013	CLER	0.1	(Nelson, James)
5/9/2013	JP	0.6	fact finding intake discussion and explanation of how our lawsuit will work
			Transfer documents recd from ECF system to docket file and create file copy(NOTICE of Docket Text Modification re [38] Application for Leave to Appear Pro Hac Vice: corrected
5/9/2013	CLER	0.1	PHV application to show which defendants were actually being represented (CMG)
			reviewed facts of [client] employment to determine if he would be a state class rep., .2;
5/9/2013	JP	0.3	emailed question to MD re if he can be a state class rep since he signed a severance .1
			Transfer documents recd from ECF system to docket file and create file copy(Docket#39 - ORDER on the [38] Application for Leave to Appear Pro Hac Vice. The Court ADMITS James N Boudreau for Kellogg Company and Kellogg Sales Company, by William M. McCool. (No document associated with this docket entry, text only.)(CMG)
5/9/2013	CLER	0.1	md respond to JP about declaration from opt-in 0.1
			review current plaintiffs to determine if any live in states where state class claims could
5/9/2013	JP	0.6	be brought
5/9/2013	MD	0.2	md/dg/jp discussing facts and evaluate potential retaliation claim 0.2
5/9/2013	JP	0.2	md/dg/jp discussing facts and evaluate potential retaliation claim 0.2
			fact finding intake interview and answered questions about the lawsuit .4 email cts and
5/9/2013	JP	0.5	contact info .1
5/9/2013	JP	0.1	email in response to how he records hours worked on daily basis
5/9/2013	DG	0.2	md/dg/jp discussing facts and evaluate potential retaliation claim 0.2
5/9/2013	JP	0.1	email in response to emailed documents
5/9/2013	JP	0.1	left voice message in response to her request for contact

Date	Staff	Amount of Time	Description
5/9/2013	JP	0.7	fact finding intake interview and explained how FLSA lawsuits work with respect to off the clock work
5/10/2013	JP	1.1	call to review employment facts for declaration .7 incorporate his facts into the declaration template .4
5/10/2013	JP	0.2	called to explain his spread sheet method of time keeping
5/10/2013	JP	0.4	fact finding intake discussion and explained lawsuit
5/10/2013	JP	0.1	email requesting more info on time keeping practice
5/10/2013	JP	0.4	MD/JP discuss having MD reveiw state class rep issues with plaintiff .1 MD/JP call and discuss with plaintiff the responsiitiies of state class rep .2 jp answer additional questions about lawsuit from plaintiff .1
5/10/2013	JP	0.2	draft and send class retainer
5/10/2013	JP	0.4	follow email requesting if plaintiff had additional info re retalaiton, .1 create memo about retaliation incident for discovery demands for defendant file .3
5/12/2013	MD	0.3	MD/JP discuss having MD reveiw state class rep issues with plaintiff .1 MD/JP call and discuss with plaintiff the responsiitiies of state class rep .2
5/13/2013	CLER	0.1	create PDF format fo correspondence recd from NLRB ( conditional withdrawal)
5/13/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#40 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Soliman S. Sayed, # (2) Consent to Sue of Ferdinando A. Tirro)(Dunn, Matt)
5/13/2013	JP	0.8	jlp/kw review latest intake information for new plaintiffs to determine claims .4 determine information needed to clarify claims of various Kellogg job titles .4
5/13/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/13/2013	KW	0.8	jlp/kw review latest intake information for new plaintiffs to determine claims .4 determine information needed to clarify claims of various Kellogg job titles .4
5/13/2013	CLER	0.3	prepare welcome ltr to new clients
5/13/2013	KW	0.4	fact finding intake interview with putative class member .3 email consent form and link to website to him .1
5/13/2013	KW	0.8	fact finding interview with new plaintiff .5 open case contacts .1 add factual information and email to lititgation team .2
5/13/2013	MD	0.1	md email client about NLRB action 0.1
5/13/2013	CLER	0.2	Data Entry of contact information of new clients
5/14/2013	DG	0.3	dg/mr edit scheduling order re discovery on esi protocol .3
5/14/2013	KW	0.2	organize and record facts regarding his claims in this case
5/14/2013	CLER	0.1	Data Entry of contact information of Judge
5/14/2013	KW	0.4	mr/kw/jp discussion issues related to definitions of "sales" and litigation strategy
5/14/2013	KW	0.4	dg/mr/jp/kw discussion to define technology used by RSRs and TMs at Kellogg of inform litigation hold efforts and ESI discovery
5/14/2013	JP	0.4	dg/mr/jp/kw discussion to define technology used by RSRs and TMs at Kellogg of inform litigation hold efforts and ESI discovery
5/14/2013	DG	1.7	dg/mr discuss model protocol for ESI required by J's rules to be in scheduling order .3; draft scheduling order 1.4
5/14/2013	DG	0.4	dg/mr/jp/kw discussion to define technology used by RSRs and TMs at Kellogg of inform litigation hold efforts and ESI discovery
5/14/2013	KW	0.6	jlp/kw review and revise declaration job descriptions for RSR and TM positions at Kellogg to make sections more accurate
5/14/2013	MD	0.1	md scheduling various court deadlines 0.1

Date	Staff	Amount of Time	Description
5/14/2013	MR	0.3	dg/mr discuss model protocol for ESI required by J's rules to be in scheduling order .3
5/14/2013	CLER	0.1	Data Entry of contact information of new client
5/14/2013	MR	0.3	review and edit final version of model ESI protocol
5/14/2013	JP	0.6	jlp/kw review and revise declaration job descriptions for RSR and TM positions at Kellogg to make sections more accurate
5/14/2013	MR	0.4	dg/mr/jp/kw discussion to define technology used by RSRs and TMs at Kellogg to inform litigation hold efforts and ESI discovery
5/14/2013	CLER	0.2	prepare welcome ltr to new client
5/14/2013	KW	0.4	jlp/kw review state class representative spreadsheet to determine status of each potential state class claim and actions needed .4
5/14/2013	MR	0.3	dg/mr edit scheduling order re discovery on esi protocol .3
5/14/2013	DG	0.2	md/dg discussing various scheduling order deadlines 0.2
5/14/2013	MR	0.4	mr/kw/jp discussion issues related to definitions of "sales" and litigation strategy
5/14/2013	JP	0.4	mr/kw/jp discussion issues related to definitions of "sales" and litigation strategy
5/14/2013	MD	0.2	md/dg discussing various scheduling order deadlines 0.2
5/14/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/14/2013	MR	1.1	work on ESI protocol draft per atty DG for scheduling order
5/14/2013	JP	0.4	jlp/kw review state class representative spreadsheet to determine status of each potential state class claim and actions needed .4
5/14/2013	KW	0.4	jp/kw review list of plaintiffs and declarations needed to support collective action motion determine which plaintiffs require a contact and who will contact which plaintiffs
5/14/2013	JP	0.4	jp/kw review list of plaintiffs and declarations needed to support collective action motion determine which plaintiffs require a contact and who will contact which plaintiffs
5/14/2013	KW	0.5	jp/kw analyze job duties of RSRs versus TMs to distinguish similarities and differences and determine how to explain each in amended complaint
5/14/2013	JP	0.1	email in response to his email about meetings with HR about hours TMs worked
5/14/2013	JP	0.1	voice message to request that plaintiff contact us about being a state class rep
5/14/2013	JP	0.5	jp/kw analyze job duties of RSRs versus TMs to distinguish similarities and differences and determine how to explain each in amended complaint
5/14/2013	JP	0.1	voice message to request that plaintiff contact us about being a state class rep
5/14/2013	MD	0.3	dg/md/kw/jp- litigation update meeting to determine tasks needing attention to complete filing amended complaint and motion for conditional certification of collective action
5/14/2013	MD	0.4	md researching states when a state class can be brought if employee signs severance 0.4
5/14/2013	MR	0.4	review and edit atty DG's draft of model ESI protocol
5/14/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#41 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jon Ritner)(Dunn, Matt)
5/14/2013	JP	0.8	review declaration to incorporate client's comments .3; phone call to client to determine what she does not agree with in declaration and to find correct language .5; draft Rule 16, 26f scheduling order .7; emails to def re scheduling for court ordered
5/14/2013	DG	0.8	scheduling conference .1

Date	Staff	Amount of Time	Description
5/14/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Jon Ritner)
5/15/2013	JP	0.1	email update letter re Illinois state class issue
5/15/2013	JP	0.5	draft declaration specific to Territory Managers
5/15/2013	JP	0.1	called and set up appointment to do a declaration
5/15/2013	JP	0.1	called and set up appointment to do a declaration
5/15/2013	KW	0.2	telephone call to follow-up on intake update case notes .1
5/15/2013	JP	1.3	fact finding intake .7 draft declaration for collective action motion .4 email draft declaration and instructions .2
5/15/2013	JP	0.1	message to call re declaration for collection action motion
5/15/2013	JP	0.1	voice message requesting a call re giving a declaration
5/15/2013	MD	0.3	md/dg call with defense counsel about 26f conference and scheduling/service of complaint 0.3
5/15/2013	JP	0.2	talked to client to encourage her to review the state class retainer and the declaration and respond to them asap
5/15/2013	MD	0.1	md review [client] declaration 0.1
5/15/2013	KW	0.2	md/kw reveiw list of possible state class actions and determinine information needed to proceed
5/15/2013	JP	0.1	message to follow up with update on the case since his last contact
5/15/2013	KW	0.3	telephone calls to follow-up on new putative class member contacts
5/15/2013	KW	0.4	review plaintiff's information to determine who has signed a severance agreement tha would prohibit them being a state calss representative .3 add information to spreadsheet for access by litigation team- .1
5/15/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Ray Thomas Lathery, # (2) Consent to Sue of Elliott Somers)
5/15/2013	MD	0.2	md/kw reveiw list of possible state class actions and determinine information needed to proceed
5/15/2013	JP	0.2	create final copy of declaration with signature page and exhibits for filing with collective action motion
5/15/2013	CLER	0.3	prepare welcome ltr to new clients
5/15/2013	DG	0.6	dg/md conf call w Jim Boudreau re scheduling order and scheduling of case .3; draft stipulation for extension .3
5/15/2013	AG	0.2	create redacted version of exhibit for filing
5/15/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/15/2013	CLER	0.1	Data Entry of contact information of new client
5/15/2013	MD	1.0	1 md researching waiver of state claims under severance agreement 1.0
5/15/2013	MD	0.1	md review and edit stipulation to defense counsel 0.1
5/16/2013	CLER	0.2	prepare welcome ltr to new client
5/16/2013	CLER	0.1	Data Entry of contact information of new client
5/16/2013	JP	0.1	follow up voice message asking client if she is still interested in joining case as she had expressed prior
5/16/2013	JP	0.5	fact finding intake interview
5/16/2013	JP	0.2	called to discuss a doing a declaration, he did not have the time for a full declaration
5/16/2013	JP	1.6	create collective action declaration with plaintiff providing facts .9; review and incorporate information to create a draft declaration .5; email instructions and draft declaration to plaintiff .2
5/16/2013	KW	1.2	fact finding interview to inform declaration to support motion for collective action .9 organize and record information for attorney review .3



Date	Staff	Amount of Time	Description
5/16/2013	KW	0.2	md/kw review and discuss points of draft declaration of [client] to support collective action motion
5/16/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/16/2013	MD	0.2	md/kw review and discuss points of draft declaration of [client] to support collective action motion
5/16/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#42 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Ray Thomas Lathery, # (2) Consent to Sue of Elliott Somers)(Dunn, Matt)
5/16/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Ronald Fowler)
5/16/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#43 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Ronald Fowler)(Dunn, Matt)
5/17/2013	MD	0.1	md write defense counsel about 26f conference 0.1
5/20/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue Attachments: # (1)Consent to Sue of Steve S. Moody)
5/20/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#44 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Steve S. Moody)(Dunn, Matt)
5/20/2013	KW	0.2	open case contact telephone call to schedule fact finding intake appointment
5/20/2013	KW	0.4	reueiw intake notes for each new consent to sue to determine follow-up information needed .4
5/20/2013	KW	0.2	telephone call to provide information to putative class member update case notes .1
5/20/2013	MA	0.1	Call from putative class member to discuss joining
5/20/2013	KW	0.2	telephone call to respond to request for information .1 update case notes .1
5/20/2013	KW	0.1	telephone call to follow-up on signature needed for retainer .1
5/20/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consent to Sue for filing
5/20/2013	CLER	0.1	create PDF format of correspondence recd from boudreau (emails)
5/20/2013	CLER	0.2	prepare welcome ltr to new client
5/20/2013	CLER	0.1	Data Entry of contact information of new client
5/21/2013	MD	0.1	md call to court re amending deadlines 0.1
5/21/2013	MD	0.3	md review defense counsel email, review document 10, and forward to local counsel 0.3
5/21/2013	MD	0.1	md respond to defense counsel about stipulation 0.1
5/21/2013	KW	0.9	fact finding interview to inform accurate facts for declaration to support collective action motion .6 revise declaration .2 email pdf to plainitff for review and signature .1
5/21/2013	MD	0.1	md/kw review status of declarations completed-to support collective action motion
5/21/2013	CLER	0.4	scan signed retainer and add to electronic file scan signed declarations and add to electronic file scan documents sent by plaintiffs and add to electronic file
5/21/2013	KW	0.2	telephone call and email to schedule appointment to discuss being state class representative for Colorado
5/21/2013	KW	0.1	md/kw review status of declarations completed-to support collective action motion
5/21/2013	MD	0.5	md drafting collective action motion 0.5



Date	Staff	Amount of Time	Description
5/21/2013	KW	1.3	intake Interview to inform declaration to support collective action motion .7 revise declaration to reflect plaintiff's work experience .3 draft cover email of instructions and email pdf of declaration .2 update case notes .1
5/21/2013	MD	1	md drafting collective action motion 1.0
5/22/2013	KW	0.1	draft and send email regarding need to clarify declaration language
5/22/2013	MD	0.2	md/kw- review discrepancies in declaration language .1 determine remedies needed .1
5/22/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (At request of counsel, the Initial Scheduling Dates have been terminated. The Deadline for FRCP 26(f) Conference will be 10 days after the defendants have answered; Initial Disclosures Pursuant to FRCP 26(a)(1) will be due 20 days after the answer; and the Joint Status Report will be due 15 days after the answer. (DN)
5/22/2013	KW	0.1	draft and send email regarding need to clarify declaration language
5/22/2013	KW	0.1	write memo with essential information for attorney follow-up .1
5/22/2013	MD	0.1	md/kw discuss best way to reach out to answer concerns of plaintiff [ ] .1
5/22/2013	KW	0.3	telephone call to schedule discussion about declaration for support of collective action motion .1 email regarding declaration issues .2
5/22/2013	MD	0.3	md/kw discuss issues raised by discrepancy in declaration language .2 work on revising language to be more accurate .1
5/22/2013	KW	0.1	md/kw discuss best way to reach out to answer concerns of plaintiff [client] .1
5/22/2013	KW	0.2	md/kw- review discrepancies in declaration language .1 determine remedies needed .1
5/22/2013	KW	0.2	draft and send email to plaintiff regarding returning declaration for collective action motion .1 update case notes .1
5/22/2013	KW	0.2	draft explanation email and pdf of consent to sue form email to putative class member at her request update case notes
5/22/2013	KW	0.2	draft and send email to plaintiff regarding returning declaration for collective action motion .1 update case notes .1
5/22/2013	KW	0.5	fact finding discussion with plaintiff to clarify declaration language .2 revise declaration .2 relay latest version to attorney .1
5/22/2013	MD	0.1	md/kw status update regarding declarations to support collective action motion and retainers for state class motions
5/22/2013	KW	0.7	fact finding interview with putative class member .6 update case notes .1
5/22/2013	KW	0.1	md/kw status update regarding declarations to support collective action motion and retainers for state class motions
5/22/2013	MD	3	md drafting collective action motion memorandum, notice, and post card notice 3.0
5/22/2013	KW	0.2	draft and send email to plaintiff regarding returning retainer for state class action motion .1 update case notes .1
5/22/2013	KW	0.2	telephone call to respond to message from plaintiff .1 update case notes to document contact attempts .1
5/22/2013	KW	0.3	telephone call from putative class member who had questions about case status and joining the lawsuit .2 update case notes .1
5/22/2013	KW	0.3	review intake notes to determine putative class members concerns about possible impact of joining on his severance payments .1 email to putative class member to answer his questions and concerns .2
5/23/2013	KW	0.3	telephone call to schedule intake interview .1 email follow-up to request for information .1 update case notes .1
5/23/2013	CLER	0.1	Data Entry of contact information of new client

Date	Staff	Amount of Time	Description
5/23/2013	CLER	0.2	prepare welcome ltr to new client
5/23/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
			fact finding interview with plaintiff to inform declaration to support collective action motion .8 organize information to draft declaration .3 email pdf with cover instructions
5/23/2013	KW	1.4	.2 update case notes .1
5/23/2013	MD	2	md drafting collective action memo 2.0
5/23/2013	KW	0.2	respond to email from potential state class representative .1 update case notes .1
5/23/2013	CLER	0.2	create PDF format of documents recd from client
			fact finding interview with putative class member.6 open case file for new intake .1
5/23/2013	KW	0.9	organize and record information .2
5/24/2013	MD	1.5	md revising amended complaint 1.5
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Joe
5/24/2013	AG	0.2	Wheeler, # (2) Consent to Sue of Gregory L. Oswald)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#45 -
			NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
5/24/2013	CLER	0.1	Consent to Sue of Joe Wheeler, # (2) Consent to Sue of Gregory L. Oswald)(Dunn, Matt)
5/24/2013	CLER	0.2	prepare welcome ltr to new client
5/24/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
5/24/2013	CLER	0.1	Data Entry of contact information of clients
5/24/2013	CLER	0.1	Data Entry of contact information of client
5/24/2013	CLER	0.2	prepare welcome ltr to new client
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
5/28/2013	AG	0.2	Craig L. Rumsey
			Transfer documents recd from ECF system to docket file and create file copy(Docket#46 -
			NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
5/28/2013	CLER	0.1	Consent to Sue of Craig L. Rumsey)(Dunn, Matt)
			telephone call to [client] to review and resolve issues of accurate wording of declaration
5/28/2013	KW	0.3	to support collective action motion .3
			dg.md.kw work to resolve issues of wording declaration to be accurate for collective
			action motion .2; legal research re meaning of primary duty of sales for explanation to
5/28/2013	DG	0.5	clients for collective action declarations .3
			dg.md.kw work to resolve issues of wording declaration to be accurate for collective
5/28/2013	MD	0.2	action motion .2
5/28/2013	KW	0.4	review and make suggested revisions to declaration to support collective action motion
5/28/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
5/28/2013	CLER	0.2	prepare welcome ltr to new client
5/28/2013	MD	0.1	md/kw consult regarding [client] declaration and clarification needed .1
5/28/2013	CLER	0.1	Data Entry of contact information of new client
5/28/2013	MD	0.2	md call with client about retainer 0.2
			dg/kw discuss issues regarding outside sales and language of the declarations supporting
5/28/2013	KW	0.2	collective action motion
			md/dg discussing status of case, including deadlines, collective action declarations,
5/28/2013	DG	0.1	moving for conditional certification, and amending complaint 0.1
			dg/kw discuss issues regarding outside sales and language of the declarations supporting
5/28/2013	DG	0.2	collective action motion
5/28/2013	KW	0.1	md/kw consult regarding [client] declaration and clarification needed .1

Date	Staff	Amount of Time	Description
5/28/2013	MD	0.1	md/dg discussing status of case, including deadlines, collective action declarations, moving for conditional certification, and amending complaint 0.1
5/28/2013	KW	0.1	print jpeg of declaration signature .1 save to electronic file
5/28/2013	KW	0.1	dg.kw discuss most accurate wording to reflect minimum sales activity on the part of plaintiffs develop substitute wording
5/28/2013	KW	0.2	dg.md.kw work to resolve issues of wording declaration to be accurate for collective action motion .2
5/28/2013	DG	0.1	dg.kw discuss most accurate wording to reflect minimum sales activity on the part of plaintiffs develop substitute wording
5/28/2013	MD	4	md drafting amended complaint to include MO claims, and break out FLSA claims 3.5 fact finding discussion with named plaintiff regarding data available to document percentage value of successful upsell activity for the purpose of counteracting outside sales defense
5/29/2013	KW	0.6	
5/29/2013	DG	0.3	dg/kw research legal definitions of "primary duty" as related to outside sales exemption .2 discuss documentation needed to support plaintiffs overtime claims .1
5/29/2013	KW	0.2	md/kw discuss latest information from plaintiffs to inform declaration to support collective action motion .1 discuss status of receipt of signed retainers for state class actions .1
5/29/2013	MD	0.2	md/kw discuss latest information from plaintiffs to inform declaration to support collective action motion .1 discuss status of receipt of signed retainers for state class actions .1
5/30/2013	DG	1.3	DG/MD/KW- review Federal legislation and regulation language related to "primary duty" and what does and does not constitute primary duty .4 discuss and calculate the the pay compensation comparison between Kellogg Territory Managers and hourly merchandisers who do much the same work .4 develop more accurate language to support collective action motion to show that employees are similarly situated in having FLSA rights violated .5
5/30/2013	MD	0.2	md/dg discussing edits to amended complaint 0.2
5/30/2013	DG	0.2	md/dg discussing edits to amended complaint 0.2
5/30/2013	KW	1.3	DG/MD/KW- review Federal legislation and regulation language related to "primary duty" and what does and does not constitute primary duty .4 discuss and calculate the the pay compensation comparison between Kellogg Territory Managers and hourly merchandisers who do much the same work .4 develop more accurate language to support collective action motion to show that employees are similarly situated in having FLSA rights violated .5
5/30/2013	DG	1.5	edit amended complaint 1.5
5/30/2013	MD	1.3	DG/MD/KW- review Federal legislation and regulation language related to "primary duty" and what does and does not constitute primary duty .4 discuss and calculate the the pay compensation comparison between Kellogg Territory Managers and hourly merchandisers who do much the same work .4 develop more accurate language to support collective action motion to show that employees are similarly situated in having FLSA rights violated .5
6/3/2013	KW	0.3	dg/kw review and revise declaration for [client] for accuracy to support motion for collective action notice
6/3/2013	DG	0.3	dg/kw review and revise declaration for [client] for accuracy to support motion for collective action notice
6/3/2013	KW	0.6	fact finding interview to inform compensation section of motion to support collective action motion .4 revise declaration using latest facts .2

Date	Staff	Amount of Time	Description
6/3/2013	KW	0.1	telephone call to plaintiff to clarify wording of retainer .1
6/4/2013	KW	0.2	email revised declaration wording for review and response
6/4/2013	KW	0.1	telephone call to [client] to discuss final declaration wording .1
6/4/2013	KW	0.2	respond to email regarding revised declaration .2
6/4/2013	KW	0.7	JP/KW Discussed revisions in collective declaration .3; reviewed needed declarations and assigned who was to cover which plaintiff, .2; reviewed intake process with people who had sent consent to sue forms and assigned case responsibility .2
6/4/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Alan Reeves Wilson)
6/4/2013	CLER	0.2	prepare welcome ltr to new client
6/4/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/4/2013	CLER	0.1	Data Entry of contact information of new client
6/4/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#47 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Alan Reeves Wilson)(Dunn, Matt)
6/4/2013	JP	0.7	JP/KW Discussed revisions in collective declaration .3; reviewed needed declarations and assigned who was to cover which plaintiff, .2; reviewed intake process with people who had sent consent to sue forms and assigned case responsibility .2
6/5/2013	KW	0.4	md/kw confer regarding facts of declaration for collective action motion
6/5/2013	KW	0.4	md/kw incorporate paragraphs related to time worked related to time on sales and pay compared to pay for merchandisers to strengthen declaration for collective action motion
6/5/2013	KW	0.4	use information provided by plaintiff to revise declaration for collective action motion
6/5/2013	KW	0.5	Complete final revisions and edits to decalration to support collective action motion .3
6/5/2013	MD	0.4	email cover instrcutons and declaration to plaintiff .2
6/5/2013	MD	0.4	md/kw incorporate paragraphs related to time worked related to time on sales and pay compared to pay for merchandisers to strengthen declaration for collective action motion
6/5/2013	KW	0.4	dg/md/jlp/kw review and finalize declaration for Territory Managers and Retail Sales Representatives to incorporate detailed information to support collective action motion
6/5/2013	KW	0.4	discussion with plaintiff to clarify job duties as a Territory Manager to inform motion for collective action
6/5/2013	JP	0.8	jlp/kw revise and edit declarations for Territory Managers and Retail Sales Representatives for final signatures .8
6/5/2013	MD	0.6	md editing declaration for collective action 0.6
6/5/2013	MD	0.4	dg/md/jlp/kw review and finalize declaration for Territory Managers and Retail Sales Representatives to incorporate detailed information to support collective action motion
6/5/2013	DG	0.4	dg/md/jlp/kw review and finalize declaration for Territory Managers and Retail Sales Representatives to incorporate detailed information to support collective action motion
6/5/2013	JP	0.4	dg/md/jlp/kw review and finalize declaration for Territory Managers and Retail Sales Representatives to incorporate detailed information to support collective action motion
6/5/2013	MD	0.4	md/kw confer regarding facts of declaration for collective action motion

Date	Staff	Amount of Time	Description
6/6/2013	KW	0.2	md/kw discussion of status of signed declarations for collective action motion review representatives for state class actions
6/6/2013	KW	0.3	review status of declaration development and status with prospective signers
6/6/2013	MD	0.2	md/kw discussion of status of signed declarations for collective action motion review representatives for state class actions
6/6/2013	JP	0.5	spoke to potential plaintiff's wife about lawsuit, answered questions
6/6/2013	KW	0.4	telephone call from putative class member concerning complaint, concern about retaliation and possible age discrimination .3 relay information to litigation team .1
6/6/2013	KW	0.7	fact finding interview to inform final declaration regarding job duties, compensation and hours worked for collective action motion
6/6/2013	JP	0.6	fact finding intake interview
6/6/2013	JP	0.5	rewrote declaration to include additional information .4; phone message to call re declaration. .1
6/6/2013	MD	1.5	md editing class action complaint 1.5
6/6/2013	JP	0.5	fact finding intake call re overtime worked
6/6/2013	JP	0.3	review status of declaration development and status with prospective signers
6/6/2013	KW	0.5	review and revise declaration to support collective action motion to incorporate additional facts .2 save to pdf and email to plaintiff .1 draft cover instructions re declaration .2
6/6/2013	KW	0.4	revise declaration template to incorporate facts of plaintiff's employment and work experience .4
6/6/2013	KW	0.3	telephone calls to and from plaintiff to work out his problems accessing, and returning signed declaration to support collective action motion
6/6/2013	KW	0.2	prepare final declaration pdf .1 email to plaintiff with cover instructions .1
6/6/2013	KW	0.7	review and revise declaration to support collective action motion to incorporate additional facts .4 save to pdf and email to plaintiff .1 draft cover instructions re declaration .2
6/7/2013	JP	0.2	JP/MR discuss issues of pending declaration
6/7/2013	MR	0.2	JP/MR discuss issues of pending declaration
6/7/2013	MD	0.3	md/jp discussing facts in declaration and edits to declaration for conditional certification 0.3
6/7/2013	DG	1.2	edit class cert brief 1.2
6/7/2013	MD	0.3	md review and edit declaration for conditional certification 0.3
6/7/2013	MD	1.5	md editing collective action motion 1.5
6/10/2013	JP	0.4	dg/md/jlp/kw review and modify method of calculating hourly rate for territory managers to be articulated in the declaration to support collective action motion
6/10/2013	MD	0.3	dg/md/jlp/kw review and modify method of calculating hourly rate for territory managers to be articulated in the declaration to support collective action motion
6/10/2013	DG	0.3	dg/md/jlp/kw review and modify method of calculating hourly rate for territory managers to be articulated in the declaration to support collective action motion
6/10/2013	KW	0.4	dg/md/jlp/kw review and modify method of calculating hourly rate for territory managers to be articulated in the declaration to support collective action motion
6/10/2013	KW	0.3	emails to and from her regarding review of declaration

Date	Staff	Amount of Time	Description
6/10/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#48 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Neil Smith, # (2) Consent to Sue of Anita McMahan, # (3) Consent to Sue of John Mele, # (4) Consent to Sue of Brent Hampton)(Dunn, Matt)
6/10/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/10/2013	MD	0.2	md/dg discussing edits to collective action motion 0.2
6/10/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Neil Smith, # (2) Consent to Sue of Anita McMahan, # (3) Consent to Sue of John Mele, # (4) Consent to Sue of Brent Hampton)
6/10/2013	KW	0.4	revise declaration in accordance to more accurately reflect pay information .2 email to plaintiff with cover instructions .1 update electronic file .1
6/10/2013	KW	0.2	respond to email from plaintiff regarding declaration to support collective action motion jlp/kw analyze formula for calculating hourly rate for Territory Managers .3 discuss issues related to calculation of hourly rate .3
6/10/2013	KW	0.6	md/dg discussing edits to collective action motion 0.2; edits to collective action brief .3; edit collective action notice .2; email to paras re how to structure client declarations re pay .1
6/10/2013	DG	0.8	Data Entry of contact information of new clients
6/10/2013	CLER	0.2	prepare welcome ltr to new clients
6/10/2013	CLER	0.4	revise declaration in accordance to more accurately reflect pay information .2 email to plaintiff with cover instructions .1 update electronic file .1
6/10/2013	KW	0.4	dg/jp draft template for client declarations .3
6/10/2013	DG	0.3	dg/jp draft template for client declarations .3
6/10/2013	JP	0.3	md editing collective action motion 1.5
6/10/2013	MD	1.5	md researching cases against similar companies 2.0
6/10/2013	MD	2	work on revising declaration to clarify facts and non-exempt status of plaintiffs regarding overtime
6/10/2013	KW	0.4	over time
6/11/2013	KW	1.9	jlp/kw review each point of collective action declaration re-work, edit, revise as needed
6/11/2013	CLER	0.1	Data Entry of contact information of new client
6/11/2013	CLER	0.1	reviewed and incorporated new changes into declaration, .6; emailed declaration to client .1
6/11/2013	JP	0.7	review, restructure, revise and edit declaration for collective action motion for RSRs
6/11/2013	JP	1.5	declaration reviewed and incorporated new changes into declaration, .6; emailed declaration to client .1
6/11/2013	JP	0.7	client .1
6/11/2013	CLER	0.2	prepare welcome ltr to new client
6/11/2013	CLER	0.2	fact finding intake interview for initial information about employment with defendant, .6;
6/11/2013	JP	0.7	email information needed for in person meeting. 1
6/11/2013	JP	0.7	review, restructure, revise and edit declaration for collective action motion for RSRs
6/11/2013	KW	1.5	declaration
6/11/2013	KW	1.5	Transfer documents recd from ECF system to docket file and create file copy(Docket#49 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jennifer Dowling)(Dunn, Matt)
6/11/2013	CLER	0.1	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jennifer Dowling)
6/11/2013	AG	0.2	(Attachments: # (1) Consent to Sue of Jennifer Dowling)



Date	Staff	Amount of Time	Description
6/11/2013	MD	3	md editing collective action motion, memo, and notice including adding new sections in memo 3.0
6/11/2013	JP	1.9	jlp/kw review each point of collective action declaration re-work, edit, revise as needed
6/11/2013	KW	0.3	update revisions to declaration template for Territory managers in preparation for finalization meeting this morning and production to plaintiffs
6/11/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/11/2013	MD	0.1	md edit complaint 0.1
6/12/2013	KW	0.6	draft declaration to support collective action motion
6/12/2013	KW	0.7	prepare final dealration to support collective action motion .4 draft cover explanatory email .2 email expalnation and declaration to named plaintiff.1
6/12/2013	KW	0.1	telephone call to arrange appointment to revise declaration .1
6/12/2013	KW	0.6	finalize declaration for collective action motion .5 draft cever email and email declaration and explanation to plaintiff .1
6/12/2013	KW	0.9	fact finding intake interview .7 organize and record information into electronic system .2
6/12/2013	JP	0.9	fact finding intake interview and answered questions about the lawsuit, .8; email consent to sue .1
6/12/2013	JP	1.4	prepare draft declaration with new additions .3; leave voice message for client to call .1; review facts of declaration with client 1.0
6/12/2013	KW	0.7	prepare final dealration to support collective action motion .4 draft cover explanatory email .2 email expalnation and declaration to named plaintiff.1
6/12/2013	KW	0.5	fact finding interview to gather informatin to inform final declaration to support collective action motion
6/13/2013	JP	0.1	set up draft declaration for plaintiff
6/13/2013	JP	0.3	jlp/kw discuss definition of "sales activity" and how to clarify this to plaintiffs in preparing declarations .3
6/13/2013	JP	0.5	integrated employment facts into declaration and determined issues to be reviewed with attorney .5
6/13/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#50 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Ronald Prater)(Dunn, Matt)
6/13/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/13/2013	CLER	0.2	prepare welcome ltr to new client
6/13/2013	CLER	0.1	Data Entry of contact information of new client
6/13/2013	KW	0.5	respond to email regarding declaration for collective action motion- .1 add pay compensation information for 2012 and 2013 .1 fianlize declaration and email to named plaintiff .3
6/13/2013	JP	0.2	MS/JP discuss how to discuss concept of sales with plaintiffs to determine if plaintiffs are involved in "sales."
6/13/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Ronald Prater)(
6/13/2013	KW	0.3	jlp/kw discuss definition of "sales activity" and how to clarify this to plaintiffs in preparing declarations .3
6/13/2013	MS	0.2	MS/JP discuss how to discuss concept of sales with plaintiffs to determine if plaintiffs are involved in "sales."
6/14/2013	CLER	0.1	Data Entry of contact information of new client
6/14/2013	MD	0.2	md edit complaint 0.2
6/14/2013	JP	0.1	voice messages and email to request contact to discuss whether or not to file his consent to sue

Date	Staff	Amount of Time	Description
6/14/2013	CLER	0.3	prepare welcome ltr to new clients
6/14/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#51 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Cheryl Cole, # (2) Consent to Sue of Heidi Warren)(Dunn, Matt)
6/14/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/14/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Cheryl Cole, # (2) Consent to Sue of Heidi Warren)
6/17/2013	KW	0.4	telephone calls and emails to complete finalization of declarations for collective action motion
6/17/2013	JP	0.1	md/jp discussing need to call client re declaration and facts supporting declaration 0.1
6/17/2013	MD	0.2	md/jp discussing conversation with client for declaration for collective action motion 0.2
6/17/2013	DG	0.1	md/dg discussing status of reviewing collective action motion and deadlines in case 0.1
6/17/2013	MD	0.1	md/jp discussing need to call client re declaration and facts supporting declaration 0.1
6/17/2013	MD	0.3	md researching definition of sales 0.3
6/17/2013	MD	0.1	md/dg discussing status of reviewing collective action motion and deadlines in case 0.1
6/17/2013	JP	0.6	md/jp call with client about sales activities 0.6
6/17/2013	JP	0.2	md/jp discussing conversation with client for declaration for collective action motion 0.2
6/17/2013	MD	0.6	md/jp call with client about sales activities 0.6
6/17/2013	CLER	0.2	scan signed declaration update electronic file
6/17/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#52 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Ron Lynch)(Dunn, Matt)
6/17/2013	CLER	0.2	prepare welcome ltr to new client
6/17/2013	JP	0.1	respond to internet query with email
6/17/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/17/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Ron Lynch)
6/17/2013	AP	1.5	Sorted CTS forms
6/17/2013	CLER	0.1	Data Entry of contact information of new client
6/17/2013	CLER	0.3	create PDF of correspondence recd from [client] (documents)
6/17/2013	KW	0.4	telephone calls and emails to complete finalization of declarations for collective action motion
6/17/2013	KW	0.4	telephone calls and emails to complete finalization of declarations for collective action motion
6/17/2013	MD	0.1	md write defense counsel about accepting service of the complaint via email 0.1
6/17/2013	JP	0.1	message to confirm appointment time at office
6/18/2013	MD	0.3	md/jp coordinate time to talk with clients about declarations/class action claims 0.3
6/18/2013	JP	1.8 .3	meet with client and reviewed documents, facts of employment, 1.0 reviewed declaration and facts for declaration, .5 and discuss, review and sign state class retainer

Date	Staff	Amount of Time	Description
6/18/2013	JP	0.3	md/jp coordinate time to talk with clients about declarations/class action claims 0.3
6/18/2013	JP	0.2	email with feedback re factual issue in declaration
6/18/2013	JP	0.9	fact finding intake
6/18/2013	JP	0.1	email referring attorney request for additional documents provided to him by plaintiff
6/18/2013	JP	0.2	email response to questions about RSMs joining lawsuit
6/18/2013	JP	0.1	email acknowledgement of receipt of signed declaration
6/18/2013	MD	1	md amending complaint to include new york class claims 1.0
6/18/2013	CLER	0.3	prepare Fedex label for client mailing of docs (0.20) email client Fedex Label (0.10)
6/18/2013	CLER	0.1	Data Entry of contact information of new client
6/18/2013	CLER	0.2	prepare welcome ltr to new client
6/18/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
			review and correct final draft declaration for client's signature .3 email declaration .1
6/18/2013	JP	0.5	email receipt of faxed signed declaration .1
6/18/2013	JP	1	review documents provided by client
6/18/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Susan Mayhugh)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#53 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
6/18/2013	CLER	0.1	Consent to Sue of Susan Mayhugh)(Dunn, Matt)
6/18/2013	JP	0.8	fact finding intake
6/18/2013	JP	0.2	multiple phone messages between office and client to try to arrange time to discuss declaration
			voice message that we need him to sign the declaration, if it is good to go and return to
6/18/2013	JP	0.1	office or call to discuss
6/19/2013	JP	0.2	md/jp discussing facts in declaration based on JP conversation with clients 0.2
6/19/2013	MD	0.2	md/jp discussing facts in declaration based on JP conversation with clients 0.2
6/19/2013	CM	0.1	call from class member re SOL (.1)
6/19/2013	MD	0.1	md prep for call with client about declaration 0.1
6/19/2013	MD	0.5	md/jp call with client about declaration 0.5
6/19/2013	MD	0.4	md editing amended complaint 0.4
6/19/2013	JP	0.1	md/jp discussing edits to client declaration 0.1
6/19/2013	MD	0.1	md/jp discussing edits to client declaration 0.1
			emails to and from plaitniff [client] to finalize declaration to suppor tocllecitve action
6/20/2013	KW	0.3	motion
			called for a collective action declaration 1.1; incorporate information into declaration .2;
6/20/2013	JP	1.6	email and fax declaration to plaintiff .2; scan and file signed declaration .1
6/20/2013	KW	0.5	discussion with plaintiff [ ] to finalize declaration update electronic file .1
6/20/2013	JP	0	KW/JP meet to discuss status of signed
6/20/2013	DG	0.5	review and edit complaint .5
6/20/2013	MD	0.7	md editing class action complaint 0.7
			jlp/kw review declarations completed review status of declarations that need action
6/20/2013	JP	0.5	assign tasks to complete declarations to support collective action motion
6/20/2013	DG	0.2	md/jp discussing status of declarations 0.2
6/20/2013	MD	0.2	md/jp discussing status of declarations 0.2

Date	Staff	Amount of Time	Description
			jlp/kw review declarations completed review status of declarations that need action
6/20/2013	KW	0.5	assign tasks to complete declarations to support collective action motion
6/21/2013	DG	0.2	further edits to state class definitions .2
6/21/2013	MD	0.1	md review client list 0.1
6/21/2013	JP	0.5	draft declaration for collective action motion, .4; voice message to call for declartion .1
6/21/2013	MD	2 2.0	md revising/editing class action complaint based on dg comments and additional claim
6/21/2013	DG	0.3	dg/md discuss amendment to complaint and service .1; legal research - reading 5th cir Meza case .2
6/21/2013	MD	0.1	dg/md discuss amendment to complaint and service .1
6/21/2013	MD	0.1	md correspond with local counsel re amended complaint 0.1
6/21/2013	MD	0.4	md writing email to to clients and local counsel about amended complaint 0.4
6/21/2013	JP	1	fact finding intake focusing of defendant's practices in California, .9; email consent to sue and website link .1
6/21/2013	JP	1.1	fact finding intake with focus on potential management exemption
6/21/2013	JP	1.3	fact finding intake
6/21/2013	JP	0.2	responded to email regarding salary earned and how that impacts his declaration
6/21/2013	MD	0.5	md editing amended complaint 0.5
6/21/2013	JP	0.2	incorporate income from tax records into declaration and email declaration
6/24/2013	CLER	0.1	Data Entry of contact information of new client
6/24/2013	CLER	0.2	prepare welcome ltr to new client
6/24/2013	KW	0.4	telephone call from putative class member who is interested in joining this case .2 reserched information for him about possible age .1 udapte case notes .1
6/24/2013	CLER	0.1	Data Entry of contact information of new client
6/24/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/24/2013	MD	0.4	md edit and prepare amended complaint to share with defense counsel 0.4
6/24/2013	KW	0.1	jlp/kw confer regarding finalization of decalration to support collective action motion
6/24/2013	JP	1.2	prepared summary of data from California intakes and plaintiffs to summarize state issues re job titles, job duties, pay changes
6/24/2013	JP	0.8	fact finding intake interview
6/24/2013	JP	0.9	fact finding intake interview and answered questions about the lawsuit
6/24/2013	KW	0.7	discussion to finalize details of declaration to support collective action motion .3 integrate new information into declaration .2 finalize declaration into pdf .1 email to plainitff .1
6/24/2013	JP	0.1	called to thank plaintiff for declaration
6/24/2013	JP	0.4	phone call request for declartion .2; called to confirm receipt of declaration and answer questions about the next step .2
6/24/2013	JP	0.7	fact finding intake interview
6/24/2013	KW	0.2	update email file for plaintiff .2
6/24/2013	MD	0.2	md correspond with defense counsel re acceptance of service of amended complaint via email 0.2
6/24/2013	CLER	0.3	print, redact and scan declaration to support collective action motion .2 update electronic file .1

Date	Staff	Amount of Time	Description
6/24/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#54 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael Learo, # (2) Consent to Sue of Debra D. Mills)(Dunn, Matt)
6/24/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael Learo, # (2) Consent to Sue of Debra D. Mills)
6/24/2013	KW	0.3	update client information spreadsheet to track information for each opt-in
6/24/2013	MD	0.8	dg/md/jlp/kw meet to review status of filing amended complaint and collective action motion discuss state class actions retainers and declarations to support collective action motion discuss litigation issues related to RSM job title
6/24/2013	KW	0.5	emails to and from plaintiff to finalize and receive final signed declaration to support collective action motion .3 receive and scan signed declaration .1 update electronic file
6/25/2013	AG	0.2	prepare certificate of service for filing of amended complaint
6/25/2013	JP	0.1	email request for information re employees in zone
6/25/2013	KW	0.3	discussion with putative class member regarding his concerns about retaliation if he joins
6/25/2013	KW	0.3	revise declaration to include additional facts .2 email to plaintiff .1
6/25/2013	KW	0.9	fact finding interview to inform declaration to support collective action motion .4 integrate information into plaintiff's declaration .3 finalize and pdf the declaration .1 email with cover explanation to plaintiff .1
6/25/2013	KW	0.3	review list of signed declarations .1 review list of state class retainers .1 email information to litigation team .1
6/25/2013	MD	0.2	md/ag discussing status of summonses 0.2
6/25/2013	JP	0.9	fact finding intake call
6/25/2013	CLER	0.2	prepare welcome ltr to new client
6/25/2013	JP	0.8	fact finding intake and answered questions about the lawsuit
6/25/2013	CLER	0.1	Data Entry of contact information of new client
6/25/2013	AG	0.2	ECF Filing AMENDED COMPLAINT CLASS ACTION AND FLSA COLLECTIVE ACTION against defendant(s) Kellogg Company, Kellogg Sales Company
6/25/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#56 - AMENDED COMPLAINT CLASS ACTION AND FLSA COLLECTIVE ACTION against defendant(s) Kellogg Company, Kellogg Sales Company, filed by Patty Thomas.(Getman, Dan)
6/25/2013	MD	0.2	md correspond with local counsel about summonses 0.2
6/25/2013	MD	0.3	md/kw discuss retaliation concerns of a putative class member .1 discuss status of declarations for collective action motion .1 discuss states to review for state class action
6/25/2013	KW	0.6	fact finding interview with putative class member .4 open case contact .1 add factual information .1
6/25/2013	DG	0.1	DG/JP discuss #s of declarations needed for each of the two job titles for collective action motion
6/25/2013	MD	0.2	md serve defendants via email 0.2
6/25/2013	MD	0.1	MD/AG discussion of service of summons and amended complaint
6/25/2013	MD	0.1	md prepare caption for case 0.1
6/25/2013	MD	0.2	MD/AG discussion of filing of amended complaint.certificate of service
6/25/2013	AG	0.1	MD/AG discussion of service of summons and amended complaint
6/25/2013	MD	0.3	md preparing documents for filing and service on defendants 0.3

Date	Staff	Amount of Time	Description
6/25/2013	AG	0.2	MD/AG discussion of filing of amended complaint.certificate of service
6/25/2013	DG	0.1	emails to litigation team re CA declaration for class .1
6/25/2013	MD	0.1	md speak with local counsel paralegal re filing amended complaint 0.1
6/25/2013	JP	0.1	DG/JP discuss #s of declarations needed for each of the two job titles for collective action motion
6/25/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#55 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Martin Little, # (2) Consent to Sue of Mitchell Medcalf)(Dunn, Matt)
6/25/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/25/2013	CLER	0.2	prepare welcome ltr to new client
6/25/2013	CLER	0.1	Data Entry of contact information of new client
6/25/2013	MD	0.2	md review edits to amended complaint 0.2
6/25/2013	JP	0.8	fact finding intake interview
6/25/2013	MD	0.2	md correspond with defense counsel about service 0.2
6/25/2013	MD	0.2	md editing amended complaint filing 0.2
6/25/2013	MD	0.1	md correspond with local counsel about filing amended complaint 0.1
6/25/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Martin Little, # (2) Consent to Sue of Mitchell Medcalf)
6/27/2013	JP	0.8	fact finding intake discussion, email CTS
6/27/2013	MD	0.1	md/jp discussing edits to consent to sue form 0.1
6/27/2013	JP	0.1	md/jp discussing edits to consent to sue form 0.1
6/27/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#58 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Rhona Schiffres, # (2) Consent to Sue of Joanie Devens)(Dunn, Matt)
6/27/2013	JP	0.2	brief fact finding intake
6/27/2013	JP	0.2	DG/JP discuss consent to sue changes re new heading and protection of state class reps. jlp/kw case status review-determine tasks going forwrad .2 review new intakes .1
6/27/2013	KW	0.5	discuss information needed from new opt-ins .2
6/27/2013	JP	0.5	jlp/kw case status review-determine tasks going forwrad .2 review new intakes .1
6/27/2013	DG	0.2	DG/JP discuss consent to sue changes re new heading and protection of state class reps.
6/27/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#57 - AFFIDAVIT of Mailing of Summons and Complaint to James N. Boudreau, Esq. on 6/26/2013, filed by Plaintiffs Jennifer Dowling, Kelley Dye, Jr, Robert Gibson, Patty Thomas. (Dunn, Matt)
6/27/2013	JP	0.1	email to potential plaintiff in response to internew query about case
6/27/2013	JP	1.1	fact finding intake interview
6/27/2013	JP	0.1	emailed confirmation of receipt of CTS
6/27/2013	MD	0.2	md/ag discussing filing of notice of service of summons/complaint 0.2
6/27/2013	MD	0.3	md editing filing re service of complaint/summons 0.3
6/27/2013	JP	0.1	left voice message for intake
6/27/2013	CLER	0.2	prepare welcome ltr to new client
6/27/2013	CLER	0.1	Data Entry of contact information of new client
6/27/2013	AG	0.2	ECF Filing of AFFIDAVIT of Mailing of Summons and Complaint to James N. Boudreau, Esq. on 6/26/2013



Date	Staff	Amount of Time	Description
6/27/2013	MD	0.2	md edit proof of service 0.2
6/27/2013	JP	0.7	fact finding intake interview
6/27/2013	JP	0.1	discussion that declaration is no longer needed from him
6/27/2013	CLER	0.2	prepare welcome ltr to new client
6/27/2013	CLER	0.1	Data Entry of contact information of new client
6/27/2013	JP	0.1	voice message request for intake
6/27/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Rhona Schiffres, # (2) Consent to Sue of Joanie Devens)
6/27/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/28/2013	DG	0.1	review facts re proving TM hours through vacation relief merchandisers' hrs .1
6/28/2013	JP	0.5	em memo to attorneys in case re: mental health disorders of class created by job demands
6/28/2013	JP	0.6	potential plaintiff provides info on practices and possible age discrimination
6/28/2013	JP	0.4	em memo to attorneys re discovery needed from defendant re hours worked by TSRs
6/28/2013	DG	0.3	email correspondence re Kellogg's communications with all class members .1; research on clients' questions re layoffs .2
7/1/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#59 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Mark Tuttle, # (2) Consent to Sue of Charles Michael Nelson, # (3) Consent to Sue of Deborah Ternet)(Dunn, Matt)
7/1/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Mark Tuttle, # (2) Consent to Sue of Charles Michael Nelson, # (3) Consent to Sue of Deborah Ternet)(
7/1/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/1/2013	CLER	0	prepare welcome ltr to new client
7/1/2013	CLER	0.1	Data Entry of contact information of new client
7/1/2013	CLER	0.3	prepare welcome ltr to new clients
7/1/2013	CLER	0.2	Data Entry of contact information of new clients
7/1/2013	JP	1.2	fact finding intake interview 1.0; email summary of facts needed from her with explanation of exemption issues .2
7/1/2013	JP	0.1	voice message for plaintiff to call office for intake
7/1/2013	JP	0.4	JP/AGP discuss how to index client documents
7/1/2013	JP	0.6	called for update on case and to ask more questions. requested a cts be emailed
7/1/2013	JP	0.1	voice message in response to his vm request to contact him
7/1/2013	AP	0.4	JP/AP discuss how to index client documents
7/1/2013	JP	0.2	emails sent to potential plaintiffs who contacted us and did not leave a phone number
7/1/2013	JP	0.7	fact finding intake interview
7/1/2013	JP	0.2	JP/KW discuss setting up issue spreadsheet for management of client facts
7/1/2013	KW	0.2	JP/KW discuss setting up issue spreadsheet for management of client facts
7/1/2013	CLER	0.2	create PDF format of correspondence recd from Yezbak, Esq. (EEOC documents)
7/1/2013	KW	0.3	read 5th Circuit Court of Appeals decision regarding Outside Sales Exemption- MEZA v IMM -recommended as good analysis of outside sales to inform analysis of job duties of Kellogg plaintiffs
7/1/2013	KW	0.2	telephone call from putative class member to discuss joining this lawsuit .1 add information to case notes .1

Date	Staff	Amount of Time	Description
7/2/2013	KW	1.1	jlp/kw discuss issues for proof chart and criteria/documents/ESI to prove each one .5 create spreadsheet of issues and possible proof .4 articulate questions needing attention
7/2/2013	JP	1.1	jlp/kw discuss issues for proof chart and criteria/documents/ESI to prove each one .5 create spreadsheet of issues and possible proof .4 articulate questions needing attention
7/2/2013	AP	1.5	Splitting Kellogg Docs in PDFSAM
7/3/2013	CLER	0.1	Data Entry of contact information of new client
7/3/2013	KW	0.7	fact finding interview wiht putative class member .5 open case contact .1 record information .1
7/3/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/3/2013	CLER	0.2	prepare welcome ltr to new client
7/3/2013	JP	0.4	fact finding intake interview
7/3/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#60 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Dennis D. Adams)(Dunn, Matt)
7/3/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Dennis D. Adams)
7/5/2013	CLER	0.3	prepare welcome ltr to new client
7/5/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Mark Trent, # (2) Consent to Sue of Jeffrey M. Rolfe)
7/5/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/5/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#61 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Mark Trent, # (2) Consent to Sue of Jeffrey M. Rolfe)(Dunn, Matt)
7/5/2013	CLER	0.2	Data Entry of contact information of new client
7/8/2013	CLER	0.2	Data Entry of contact information of new clients
7/8/2013	JP	0.4	call to discuss MD meeting in Phoenix and discussed client attending
7/8/2013	MD	0.3	MD/JP discuss managing client contact for Arizona meeting,.2; discuss high numbers of psychiatric disabilities and diagnoses among clients and if there is a legal way to address this isse .1
7/8/2013	JP	0.3	client's husband called with questions about retaliation for joining the lawsuit
7/8/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue. (Attachments: # (1) Consent to Sue of Janice Nannette Ivey, # (2) Consent to Sue of Mary N. Ivey)
7/8/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#62 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Janice Nannette Ivey, # (2) Consent to Sue of Mary N. Ivey)(Dunn, Matt)
7/8/2013	JP	0.4	anonymous employee called to ask questions about the lawsuit and about retaliation
7/8/2013	JP	0.3	MD/JP discuss managing client contact for Arizona meeting,.2; discuss high numbers of psychiatric disabilities and diagnoses among clients and if there is a legal way to address this isse .1
7/8/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/8/2013	CLER	0.3	prepare welcome ltr to new clients
7/8/2013	JP	0.1	emailed plaintiff info to MD for upcoming meeting in Arizona
7/8/2013	JP	0.1	left voice message for plaintiff to call for intake

Date	Staff	Amount of Time	Description
7/9/2013	KW	0.5	telephone call to putative class member regarding his request to hold his Consent to Sue .2 update case notes .1 draft cover letter .1 process mailing return of Consent at his request .1
7/9/2013	MD	1.5	md meet with intakes and clients to discuss case 1.5
7/9/2013	MD	0.2	md prepare for meeting with clients0 .2
7/9/2013	JP	0.6	fact finding intake interview
7/10/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/10/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#63 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Dion P. McLain, # (2) Consent to Sue Tony Smith)(Dunn, Matt)
7/10/2013	CLER	0.2	Data Entry of contact information of new clients
7/10/2013	KW	0.7	jlj/kw discuss updated client list to determine possible state class representatives .4 review notes of plaintiffs to be contacted and information needed .3
7/10/2013	JP	0.7	reviewed document sent by potential plaintiff and summarized data contained for attorneys & possible discovery request
7/10/2013	JP	0.7	jlj/kw discuss updated client list to determine possible state class representatives .4 review notes of plaintiffs to be contacted and information needed .3
7/10/2013	JP	0.1	phone message in response to request for a phone call to discuss case
7/10/2013	KW	0.2	review consent to sue of [client] .1 forward to A Garcia for filing .1
7/10/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Dion P. McLain, # (2) Consent to Sue Tony Smith)
7/10/2013	JP	0.9	reviewed and updated information on client spreadsheet to determine fact finding intakes needed
7/10/2013	CLER	0.3	prepare welcome ltr to new clients
7/11/2013	CLER	0.2	Data Entry of contact information of new client
7/11/2013	AG	0.2	prepare ltr with consent to sue
7/11/2013	CLER	0.2	prepare mailing to individual with consent to sue
7/11/2013	JP	0.3	called and discussed that client thought he could not join the lawsuit since he signed a severance, explained that he could join .2; emailed consent to sue .1
7/11/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#64 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kim P. Bjorklund)(Dunn, Matt)
7/11/2013	JP	0.3	md/jp discussing facts for RSM position for potential new claims 0.3
7/11/2013	MD	0.3	md/jp discussing facts for RSM position for potential new claims 0.3
7/11/2013	JP	0.1	follow up email and voice message about being able to join lawsuit even if he signed a severance
7/11/2013	CLER	0.2	prepare welcome ltr to new client
7/11/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/11/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kim P. Bjorklund)
7/11/2013	JP	0.3	download & review emailed documents
7/11/2013	MD	0.3	md/jp/kw discussing md meeting with intakes and clients 0.3
7/11/2013	AG	0.2	PCF individual requesting a consent to sue mailed to her.
7/11/2013	CLER	0.1	Data Entry of contact information of new client
7/11/2013	JP	0.2	called to set up appointment to speak with Mr. Getman
7/12/2013	JP	0.4	DG/JP discuss plaintiff's meeting with Kellogg attorneys re work conditions

Date	Staff	Amount of Time	Description
7/12/2013	DG	0.2	md/dg discussing md call with client and potential retaliation claims 0.2
7/12/2013	DG	0.4	DG/JP discuss plaintiff's meeting with Kellogg attorneys re work conditions
7/12/2013	MD	0.2	md/dg discussing md call with client and potential retaliation claims 0.2
7/15/2013	JP	0.1	called and set up time for fact finding discussion
7/15/2013	KW	0.7	DG/MD/JP/KW review status of collective action motion; discuss impact of severance agreement terms on state class actions discuss possible retaliation action against [client] and follow-up discuss ex-manager witness information determine tasks, who is responsible for each task
7/15/2013	JP	0.6	jp/kw revise case proof chart to reflect input from litigation team .2 discuss contacts for state class action retainers .1 review plaintiff's information list to determine which plaintiffs would be good deponents .2 revise client list to reflect additional information
7/15/2013	KW	0.4	scan most recently received consents to sue to prepare for ECF filing .4
7/15/2013	MD	0.7	DG/MD/JP/KW review status of collective action motion; discuss impact of severance agreement terms on state class actions discuss possible retaliation action against [client] and follow-up discuss ex-manager witness information determine tasks, who is responsible for each task
7/15/2013	JP	0.7	DG/MD/JP/KW review status of collective action motion; discuss impact of severance agreement terms on state class actions discuss possible retaliation action against [client] and follow-up discuss ex-manager witness information determine tasks, who is responsible for each task
7/15/2013	DG	0.7	DG/MD/JP/KW review status of collective action motion; discuss impact of severance agreement terms on state class actions discuss possible retaliation action against [client] and follow-up discuss ex-manager witness information determine tasks, who is responsible for each task
7/15/2013	KW	0.7	jp/kw review case developments .2 discuss follow-up for new intakes and new filed consents to sue .2 prepare agenda for litigation team meeting .3
7/15/2013	MD	0.5	md research virginia state law for overtime reqs and statute of limitations 0.5
7/15/2013	JP	0.7	jp/kw review case developments .2 discuss follow-up for new intakes and new filed consents to sue .2 prepare agenda for litigation team meeting .3
7/15/2013	KW	0.6	jp/kw revise case proof chart to reflect input from litigation team .2 discuss contacts for state class action retainers .1 review plaintiff's information list to determine which plaintiffs would be good deponents .2 revise client list to reflect additional information
7/15/2013	JP	0.1	voice message to call the office for an intake
7/15/2013	KW	0.3	telephone call to follow-up on request for information open case contact update information
7/15/2013	JP	0.9	fact finding intake discussion .7; email consent and additional info on age discrimination .2
7/15/2013	MD	0.3	md draft email to defense counsel about potential retaliation claim and termination of client 0.3
7/16/2013	JP	0.2	email information needed to consider bringing a class action lawsuit
7/16/2013	JP	0.1	email request for promised documents
7/16/2013	JP	0.2	follow up call re if she was joining the case
7/16/2013	CLER	0.3	scan consent to sue redact identifying information to prepare for ECF filing update electronic file of consents files
7/16/2013	JP	0.2	jp/kw discuss plan to review all case notes and documents and add information to proof chart .2
7/16/2013	CLER	0.3	scan consent to sue redact identifying information to prepare for ECF filing update electronic file of consents files

Date	Staff	Amount of Time	Description
7/16/2013	CLER	0.3	scan consent to sue redact identifying information to prepare for ECF filing update electronic file of consents files
7/16/2013	JP	0.1	message to call for intake interview
7/16/2013	JP	1	fact finding intake discussion and answered questions about the lawsuit
7/16/2013	KW	0.3	telephone call to plaintiff to clarify employment dates email to plaintiff to clarify employment dates email information to litigation team
7/16/2013	KW	0.2	jlp/kw discuss plan to review all case notes and documents and add information to proof chart .2
7/16/2013	JP	0.5	fact finding intake discussion
7/16/2013	KW	0.3	telephone call to plaintiff to: follow-up on termination issues explore possibility of state class update case notes
7/16/2013	CLER	0.3	scan consent to sue redact identifying information to prepare for ECF filing update electronic file of consents files
7/16/2013	CLER	0.3	scan consent to sue redact identifying information to prepare for ECF filing update electronic file of consents files
7/16/2013	JP	0.5	fact finding intake interview
7/16/2013	CLER	0.3	scan consent to sue redact identifying information to prepare for ECF filing update electronic file of consents files
7/16/2013	CLER	0.3	scan consent to sue redact identifying information to prepare for ECF filing update electronic file of consents files
7/17/2013	KW	0.4	intake interview .3 email link to website and Consent to her .1
7/17/2013	KW	0.3	discussion of complaint filed in this case .2; discussion of how to complete consent to sue form .1
7/17/2013	KW	0.4	fact finding interview regarding how to join and technology used for employment .3
7/17/2013	KW	0.4	update case notes .1
7/17/2013	KW	0.4	interview with plaintiff regarding state class representation for Arizona .4
7/17/2013	KW	0.8	jlp/mr/kw analyze data needed to determine programs used by defendant to communicate with and track plaintiffs work
7/17/2013	MA	0.3	KW/MA update Kellogg website to include updated consent to sue form
7/17/2013	KW	0.4	prepare cover explanation and pdf of retainer for state class representative .3 email to plaintiff .1
7/17/2013	KW	0.1	update docket file
7/17/2013	CLER	0.3	received and copied faxed Consent .1 scanned and redacted in preparation for filing .1
7/17/2013	MR	0.6	open case contact .1
7/17/2013	MR	0.6	web research into information systems used by Defendant
7/17/2013	KW	0.3	KW/MA update Kellogg website to include updated consent to sue form
7/17/2013	KW	0.4	meet with summer intern to explain need to develop issues chart -- need to review documents produced by plaintiffs and case notes to verify and record evidence for each issue
7/17/2013	KW	1.4	intake interview .8 organize information .3 open case contact .1 update case notes .2
7/17/2013	JP	0.5	fact finding intake interview and described lawsuit .4; email cts .1
7/17/2013	JP	0.8	jlp/mr/kw analyze data needed to determine programs used by defendant to communicate with and track plaintiffs work
7/17/2013	MR	0.8	jlp/mr/kw analyze data needed to determine programs used by defendant to communicate with and track plaintiffs work
7/17/2013	KW	0.9	review new consent to sue form for accuracy .1 update electronic file of web postings .2 substitute new consent to sue form for previous one in all web postings .6

Date	Staff	Amount of Time	Description
7/17/2013	MR	0.2	check for litigation hold letter to Def .1, email to attys/paras regarding lit hold letter .1
7/18/2013	MR	0.2	MD/MR discuss settlement figures in other cases
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	MR	0.1	scan and email notes of data fields discussion to para JP
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	MR	1.2	MR/JP discuss ediscovery issues and how to manage database inclusion of periods of employment and job titles in employment
7/18/2013	JP	0.7	fact finding intake
7/18/2013	JP	0.9	fact finding intake and discussion of being state class rep
7/18/2013	MR	0.2	additional web research regarding Def IT systems
7/18/2013	CLER	0.2	receive consent form, copy, redact and scan to prepare for ECF filing
7/18/2013	DG	2	edit collective action brief 2
7/18/2013	KW	0.4	initial contact call from putative class member .2 open case contact .1 record information .1
7/18/2013	JP	0.1	email client re information sent on hand held devices
7/18/2013	JP	0.1	phone message in response to emailed request for info
7/18/2013	MD	0.2	MD/MR discuss settlement figures in other cases
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	KW	1.4	review Defendant's Answer to Amended Complaint .3 Draft Comparison document-comparing Answer to Amended Complaint .9 Scan Comparison document and Affirmative Defenses .1 email Hyperlink to comparison document to litigation team .1
7/18/2013	DG	0.3	md/dg discussing edits and arguments to collective action motion 0.3
7/18/2013	DG	0.1	dg/md discuss issues with collective brief .1
7/18/2013	JP	0.9	update "issues spreadsheet:" with data from plaintiffs and from internet searches
7/18/2013	MD	0.3	md/dg discussing edits and arguments to collective action motion 0.3
7/18/2013	MD	0.1	dg/md discuss issues with collective brief .1
7/18/2013	KW	0.2	complete ECF filing of Consent to Sue
7/18/2013	MD	3.5	md editing collective action motion and notice, and including section for happy campers 3.5
7/18/2013	JP	0.6	review emailed documents .2; send documents and related info to attorneys .2; email plaintiff acknowledgement of receipt of docs and provide feedback re questions .2
7/18/2013	JP	1.2	MR/JP discuss ediscovery issues and how to manage database inclusion of periods of employment and job titles in employment
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received



Date	Staff	Amount of Time	Description
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/18/2013	MR	0.3	read email from para KW .1, continued web research into Defendant systems .2
7/18/2013	KW	0.3	Complete ECF filing of Consent to sue update electronic file of Consents filed update electronic client files of Signed Consents received
7/19/2013	CM	0.1	call from opt-in to confirm receipt of consent to sue (.1)
7/22/2013	CLER	0.3	Transfer documents recd from ECF system to docket file and create file copy(Docket#66 - NOTICE of filing of Consents to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Marsha Adams, # (2) Consent to Sue of Michael Controne, # (3) Consent to Sue of Mark Harsanye, # (4) Consent to Sue of Michael Jarvis, # (5) Consent to Sue of Norma Jenkins, # (6) Consent to Sue of Joseph Smith, # (7) Consent to Sue of Brian VandeBrake, # (8) Consent to Sue of Tom Whitehead, # (9) Consent to Sue of Mark Yapuncich, # (10) Consent to Sue of Anthony Zito)(Getman, Dan)
7/22/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#67 - NOTICE of filing Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Marcella Holman)(Getman, Dan)
7/22/2013	MD	0.1	md read declaration Kellogg secured from class members 0.1
7/22/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Jennifer Clayborn, # (2) Consent to Sue of Eddy A. Miller, # (3) Consent to Sue of Leonard Newman)
7/22/2013	JP	0.7	fact finding intake
7/22/2013	JP	0.1	em and voice message in response to internet request for info
7/22/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/22/2013	CLER	0.4	prepare welcome ltr to new clients
7/22/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#68 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jennifer Clayborn, # (2) Consent to Sue of Eddy A. Miller, # (3) Consent to Sue of Leonard Newman)(Dunn, Matt)
7/22/2013	CLER	0.2	Data Entry of contact information of new clients
7/22/2013	KW	0.3	reach out to plaintiff to schedule discussion of litigation progress and possible state class action in MN .2 update case notes .1
7/22/2013	KW	2.7	print and review each declaration for collective action motion go through collective action motion and add cites for each point as needed.
7/22/2013	JP	0.1	vm & em in response to his request for info
7/23/2013	JP	0.7	reviewed facts about RSM position and specifics about New Jersey practices
7/23/2013	KW	0.4	use Time Matters to update client list to include new plaintiff information
7/23/2013	KW	0.5	initial fact finding interview 4 add information to case notes .1
7/23/2013	MD	0.1	md email defense counsel about 26f conference
7/23/2013	MD	0.1	md/kw discussing edits to collective action motion 0.1
7/23/2013	KW	2.3	review collective action motion to check facts and add citations from declarations of plaintiffs
7/23/2013	KW	0.8	interview regarding state class representation .4 add information to case notes .1 prepare retainer .2 draft cover email and email pdf of retainer to plaintiff .1
7/23/2013	KW	0.6	discussion of state class action for MN and plaintiff possibly being state class representative .4 add informatin to case notes .1 email to litigation team .1
7/23/2013	MD	0.1	md review kw edits to collective action motion 0.1
7/23/2013	KW	0.1	md/kw discussing edits to collective action motion 0.1

Date	Staff	Amount of Time	Description
7/23/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#65 - ANSWER to [56] Amended Complaint by Kellogg Company, Kellogg Sales Company.(Nelson, James)
7/24/2013	JP	0.5	questions about how case has progressed, questions about joining given that he signed a severance .4; emailed consent to sue .1
7/24/2013	JP	0.1	email consent to sue
7/24/2013	KW	0.8	initial intake interview .5 open case contact .1 organize information and update case notes .2
7/24/2013	JP	0.1	voice message trying to contact her for an intake
7/24/2013	CM	0.1	call from potential opt-in with questions re case (.1)
7/24/2013	JP	0.1	vm to call for intake
7/24/2013	JP	0.1	vm & em in response to request for case information
7/24/2013	KW	0.2	confer with intern regarding verifying declaration citations for collective action motion
7/24/2013	JP	0.8	fact finding intake interview
7/24/2013	JP	0.6	fact finding intake interview
7/24/2013	JP	0.7	MD/JP/KW litigation strategy session: discuss claims of state class actions, discuss claims of RSMs who do not supervise more than 80 hours a week, discuss how to deal with "Happy Camper" declarations
7/24/2013	MD	0.7	MD/JP/KW litigation strategy session: discuss claims of state class actions, discuss claims of RSMs who do not supervise more than 80 hours a week, discuss how to deal with "Happy Camper" declarations
7/24/2013	JP	0.9	fact finding intake interview
7/24/2013	KW	0.7	MD/JP/KW litigation strategy session: discuss claims of state class actions, discuss claims of RSMs who do not supervise more than 80 hours a week, discuss how to deal with "Happy Camper" declarations
7/24/2013	CLER	0.2	organize and update paper files of consents to sue
7/25/2013	KW	0.4	telephone call to plaintiff to discuss possible ESI to prepare for discussion of ESI with defense counsel .2 update case notes .1 email information to attorney .1
7/25/2013	JP	1	fact finding intake discussion
7/25/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#69 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Tiffany Sutton, # (2) Consent to Sue of Diane Stein)(Dunn, Matt)
7/25/2013	MR	0.2	briefly examine Def draft ESI protocol
7/25/2013	MR	1	review and edit ESI model protocol .6, email list of suggested edits to attys .4
7/25/2013	MR	0.1	email question to atty MD about preservation letter
7/25/2013	KW	0.4	telephone call to plaintiff to discuss possible ESI to prepare for discussion of ESI with defense counsel .2 update case notes .1 email information to attorney .1
7/25/2013	JP	0.1	email attorney question of how NY opt ins are to get their NY State wage and hour claim represented
7/25/2013	JP	0.1	voice message to call for intake
7/25/2013	DG	0.2	md/dg discussing results of call with defense counsel and moving for conditional certification 0.2
7/25/2013	MD	0.2	md/mr discussing ESI protocol and edits to WDWA model protocol 0.2
7/25/2013	MR	0.2	md/mr discussing ESI protocol and edits to WDWA model protocol 0.2
7/25/2013	KW	0.6	fact finding intake interview .5 open case contact .1

Date	Staff	Amount of Time	Description
7/25/2013	MD	0.2	md/dg discussing results of call with defense counsel and moving for conditional certification 0.2
7/25/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue
7/25/2013	KW	0.2	telephone call to discuss retainer for state class action .2
7/25/2013	KW	0.3	organize information and add to case notes .2 email to lead paralegal .1
7/25/2013	MD	0.3	md edit ESI preservation letter 0.3
7/25/2013	CLER	0.3	prepare welcome ltr to new client
7/25/2013	CLER	0.2	Data Entry of contact information of new clients
7/25/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/25/2013	DG	0.5	md/dg conference call with defense counsel about case management plan 0.5
7/25/2013	MD	1	md editing collective action motion 1.0
7/25/2013	MD	0.5	md discussing strategy for case management plan with defense counsel 0.5
7/25/2013	MD	0.5	md/dg conference call with defense counsel about case management plan 0.5
7/25/2013	KW	0.1	telephone call to follow-up on state class action retainer.1
7/25/2013	MD	0.2	MD/Kw discuss possible forms of ESI to be explored with Kellogg plaintiffs .2
7/25/2013	DG	0.5	md discussing strategy for case management plan with defense counsel 0.5
7/25/2013	MD	2	md preparing for 26f conference with defense counsel and editing case management plan 2
7/25/2013	DG	0.1	review ESI proposal .1
7/25/2013	DG	0.5	md discussing strategy for case management plan 0.5
7/25/2013	KW	0.4	fact finding interview regarding details of RSR job duties and RSM job duties .4
7/26/2013	CLER	0.2	Data Entry of contact information of new clients
7/26/2013	MR	0.6	md/dg/mr discussing edits to model ESI protocol 0.6
7/26/2013	MD	0.6	md/dg/mr discussing edits to model ESI protocol 0.6
7/26/2013	JP	0.7	fact finding intake
7/26/2013	JP	0.4	call to discuss concerns about kellogg notifying potential employers that he is in lawsuit
7/26/2013	JP	0.8	fact finding intake
7/26/2013	JP	0.1	vm re is he joining lawsuit
7/26/2013	JP	0.1	vm re is he joining lawsuit
7/26/2013	JP	0.3	memo of issues with having RSRs join lawsuit who believe they are sales primarily
7/26/2013	JP	0.1	vm re is he joining lawsuit
7/26/2013	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Brent E. Tuggle
7/26/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/26/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#70 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jason McConnell, # (2) Consent to Sue of Jeffrey A. Truesdell)(Dunn, Matt)
7/26/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#71 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Brent E. Tuggle)(Dunn, Matt
7/26/2013	MD	0.2	md/mr discussing esi model protocol 0.2
7/26/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Jason McConnell, # (2) Consent to Sue of Jeffrey A. Truesdell)
7/26/2013	MD	4	md editing collective action motion in preparation for filing 4.0
7/26/2013	CLER	0.3	prepare welcome ltr to new client
7/26/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/26/2013	JP	0.7	update case file and document index

Date	Staff	Amount of Time	Description
7/26/2013	DG	0.6	md/dg/mr discussing edits to model ESI protocol 0.6
7/26/2013	MD	0.2	MD/JP discuss potential plaintiff concerns about future employers learning of his joining lawsuit
7/26/2013	JP	0.2	MD/JP discuss potential plaintiff concerns about future employers learning of his joining lawsuit
7/26/2013	JP	1.4	fact finding intake
7/29/2013	MR	1.3	reviewed and edited two ESI protocol drafts from atty MD
7/29/2013	CLER	0.2	Data Entry of contact information of new clients
7/29/2013	MD	0.2	md/kw discuss current case status, .1 need to convert documents from pdf to word .1
7/29/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Robert Martinez, # (2) Consent to Sue of Thomas Beckmann, # (3) Consent to Sue of James Ganpat, # (4) Consent to Sue of Christian Garcia, # (5) Consent to Sue of Joseph Garzino)
7/29/2013	KW	0.4	telephone call from putative class memebr to see if we received her signed CTS- .1 search through files and records to find signed CTS .1 telephone call to her regarding faxing signed CTS .1 telephone call to her to inform her we had received CTS .1
7/29/2013	KW	0.6	orgainze intake information .2 develop informational memo for intake paralegal .3 update case information .1
7/29/2013	JP	0.1	email to attorney suggesting rationale for in person meeting of NY plaintiffs and potential plaintiffs
7/29/2013	JP	0.1	email case attorneys potential plaintiff's request to for info about whether commute time is included in lawsuit -
7/29/2013	JP	0.8	fact finding intake discussion
7/29/2013	JP	0.1	voice message to call for intake discussion
7/29/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#72 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Robert Martinez, # (2) Consent to Sue of Thomas Beckmann, # (3) Consent to Sue of James Ganpat, # (4) Consent to Sue of Christian Garcia, # (5) Consent to Sue of Joseph Garzino)(Dunn, Matt)
7/29/2013	MD	0.8	md editing and drafting model ESI protocol 0.8
7/29/2013	KW	0.8	jlp/kw discuss details of job duties of RSRs as described by NYC metropolitan intakes .4 discuss possibly meeting with intakes to clarify information related to job duties, the amended complaint and the path to proving non-exempt OT status .4
7/29/2013	KW	0.3	receive and review state class action retainer from [client] .1 update electronic file .1 email litigation team re retainer and next steps in filing state class action .1
7/29/2013	KW	0.2	md/kw discuss current case status, .1 need to convert documents from pdf to word .1
7/29/2013	JP	0.8	jlp/kw discuss details of job duties of RSRs as described by NYC metropolitan intakes .4 discuss possibly meeting with intakes to clarify information related to job duties, the amended complaint and the path to proving non-exempt OT status .4
7/29/2013	MD	0.5	md editing esi protocol and send to defense counsel 0.5
7/29/2013	JP	0.3	call people who have requested phone calls who have not called back
7/29/2013	DG	0.2	review edits to ESI protocol .2
7/29/2013	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing

Date	Staff	Amount of Time	Description
7/29/2013	KW	0.6	fact finding intake interview with new plaintiff .6
7/29/2013	KW	0.1	telephone call follow-up regarding state class retainer .1
7/29/2013	KW	0.5	organize information from intake interview .2 add information to case notes .2 email information to litigation team .1
7/29/2013	CLER	0.5	prepare welcome ltr to new clients
7/29/2013	CLER	0.2	Data Entry of contact information of new clients
7/29/2013	KW	0.1	use abby fine reader to convert Model Protocol for Discovery to Word document .1
7/29/2013	KW	0.4	prepare state class retainer for MN .1 draft explanatory email .1 email retainer to plaintiff .1 update case notes .1
7/29/2013	JP	0.1	voice message to call for intake re facts of employment
7/29/2013	DG	0.5	edit def's version of scheduling order .5
7/29/2013	JP	0.1	voice message to call for intake on facts of employment
7/30/2013	CLER	0.1	Data Entry of contact information of new client
7/30/2013	DG	0.3	edits to scheduling order .2; email to MD re change .1
7/30/2013	CLER	0.2	prepare welcome ltr to new client
7/30/2013	KW	0.4	MA/KW work on formatting collective action motion to meet demands of Federal Court in WA .4
7/30/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue. (Attachments: # (1) Consent to Sue of Anne LeRoy, # (2) Consent to Sue of Ronald J. Jubber Jr., # (3) Consent to Sue of Linda K. Hutchkiss)
7/30/2013	KW	0.4	Format Plaintiffs' collective action motion .4
7/30/2013	MA	0.4	MA/KW work on formatting collective action motion to meet demands of Federal Court in WA .4
7/30/2013	KW	0.4	MD/KW discussion to clarify details of primary job duties of RSRs incorporating new information from new plaintiffs .3 discuss work needed to file collective action motion .1
7/30/2013	DG	0.1	DG/KW discuss most recent information regarding details of job duties for RSRs
7/30/2013	CLER	0.1	Data Entry of contact information of new client
7/30/2013	KW	0.1	MD/KW discuss preparation of exhibits for collective action motion
7/30/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#73 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Anne LeRoy, # (2) Consent to Sue of Ronald J. Jubber Jr., # (3) Consent to Sue of Linda K. Hutchkiss)(Dunn, Matt)
7/30/2013	JP	0.8	fact finding intake discussion .7; email consent to sue .1
7/30/2013	KW	0.3	preparation of exhibits for collective action motion .3
7/30/2013	KW	0.5	review the definitions of the classes in the Amended Complaint .1 edit wording in collective action memo and motion to match wording in Amended Complaint .2 format collective action memo .2
7/30/2013	KW	1.1	initial intake interview .6 organize information - add to case notes .4 email memo to lead paralegal .1
7/30/2013	JP	0.1	email client facts about filing of consent
7/30/2013	MD	1.5	md reviewing and editing case management plan 1.5
7/30/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/30/2013	CLER	0.2	prepare welcome ltr to new client
7/30/2013	KW	0.1	DG/KW discuss most recent information regarding details of job duties for RSRs
7/30/2013	MD	0.4	MD/KW discussion to clarify details of primary job duties of RSRs incorporating new information from new plaintiffs .3 discuss work needed to file collective action motion .1

Date	Staff	Amount of Time	Description
7/31/2013	CLER	0.2	prepare welcome ltr to new client
7/31/2013	CLER	0.1	Data Entry of contact information of new client
7/31/2013	KW	0.9	preparation of exhibits for collective action motion .9
7/31/2013	DG	0.1	md/dg discussing filing deadlines for collective action motion 0.1
7/31/2013	MD	1.5	md editing collective action motion for filing 1.5
7/31/2013	CLER	0.3	prepare welcome ltr to new clients
7/31/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
			Transfer documents recd from ECF system to docket file and create file copy(Docket#74 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kevin Walthers, # (2) Consent to Sue of Steven Nani, # (3) Consent to Sue of Lisa Cajoie)(Dunn, Matt)
7/31/2013	CLER	0.2	Sue of Lisa Cajoie)(Dunn, Matt)
7/31/2013	MD	2.5	md review, perform case law research, and edit 26f case management plan 2.5
7/31/2013	CLER	0.2	Data Entry of contact information of new clients
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Kevin Walthers, # (2) Consent to Sue of Steven Nani, # (3) Consent to Sue of Lisa Cajoie)
7/31/2013	AG	0.2	Kevin Walthers, # (2) Consent to Sue of Steven Nani, # (3) Consent to Sue of Lisa Cajoie)
7/31/2013	AG	0.1	ECF Filing of Joint STATUS REPORT AND RULE 26(f) DISCOVERY PLAN
7/31/2013	DG	0.2	md/dg discussing edits to case management plan 0.2
7/31/2013	MD	0.2	md/dg discussing edits to case management plan 0.2
			Transfer documents recd from ECF system to docket file and create file copy(Docket#75 - Joint STATUS REPORT AND RULE 26(f) DISCOVERY PLAN by Plaintiff Patty Thomas.
7/31/2013	CLER	0.1	(Getman, Dan)
7/31/2013	KW	0.4	initial intake enquiry .2 open case contact .1 update case information notes .1
7/31/2013	MD	0.1	md/dg discussing filing deadlines for collective action motion 0.1
7/31/2013	DG	0.7	edit proposed scheduling order .7
			jp/kw discuss the increase in intakes and how best to manage information and state class
8/1/2013	JP	0.4	determinations
8/1/2013	JP	1.1	fact finding intake focusing on RSR job duties in Eastern region
8/1/2013	JP	0.1	em and vm re case update
			Transfer documents recd from ECF system to docket file and create file copy(Docket#76 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Andrea Flajole, # (2) Consent to Sue of Alan L. Bradley, # (3) Consent to Sue of Robert Munson)(Dunn, Matt)
8/1/2013	CLER	0.1	Sue of Robert Munson)(Dunn, Matt)
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Andrea Flajole, # (2) Consent to Sue of Alan L. Bradley, # (3) Consent to Sue of Robert Munson)
8/1/2013	AG	0.2	Munson)
8/1/2013	JP	0.4	discussion with potential plaintiff about joining case and severance agreement
			review 12 plaintiff declarations to be attached to Collective action motion add exhibits as needed
8/1/2013	KW	0.8	needed
			jp/kw review and discuss memo in support of collective action motion-add suggestions
8/1/2013	KW	1.5	1.5
8/1/2013	JP	1.5	jp/kw review and discuss memo in support of collective action motion- add suggestions
8/1/2013	CLER	0.1	Data Entry of contact information of new client
8/1/2013	CLER	0.2	prepare welcome ltr to new client
8/1/2013	CLER	0.3	prepare welcome ltr to new clients
			jp/kw discuss the increase in intakes and how best to manage information and state class
8/1/2013	KW	0.4	determinations
8/1/2013	CLER	0.2	Data Entry of contact information of new clients
8/1/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing



Date	Staff	Amount of Time	Description
8/2/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#77 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael R. Przybyszewski, # (2) Consent to Sue of Jeffrey Maragh, # (3) Consent to Sue of Jeffrey Bobrow)(Dunn, Matt)
8/2/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael R. Przybyszewski, # (2) Consent to Sue of Jeffrey Maragh, # (3) Consent to Sue of Jeffrey Bobrow)
8/2/2013	CLER	0.2	prepare welcome ltr to new client
8/2/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/2/2013	CLER	0.2	Data Entry of contact information of new clients
8/2/2013	CLER	0.3	prepare welcome ltr to new client
8/2/2013	CLER	0.1	Data Entry of contact information of new client
8/2/2013	CM	0.1	enter client contact information into TM (.1)
8/2/2013	CLER	0.2	create PDF format of documents recd from client
8/5/2013	KW	0.3	reviewed spreadsheet regarding outstanding retainers for state class actions .1 draft explanatory email .1 email prepared retainer to plaintiff .1
8/5/2013	KW	0.3	reviewed spreadsheet regarding outstanding retainers for state class actions .1 draft explanatory email .1 email prepared retainer to plaintiff .1
8/5/2013	KW	0.1	verify contact information as given on CTS
8/5/2013	KW	0.1	verify contact information as given on CTS
8/5/2013	KW	0.1	verify contact information as given on CTS
8/5/2013	KW	0.1	verify contact information as given on CTS
8/5/2013	KW	0.1	verify contact information as given on CTS
8/5/2013	KW	0.1	correct and verify contact information as given on CTS
8/5/2013	DG	1	edit collective action brief 1
8/6/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Helen Conley)
8/6/2013	JP	0.6	fact finding intake
8/6/2013	MA	0.1	DG/MA update TOA on edited collective action brief .1
8/6/2013	JP	0.1	jp/kw confer regarding potential state class representatives
8/6/2013	KW	0.1	jp/kw confer regarding potential state class representatives
8/6/2013	DG	0.1	DG/MA update TOA on edited collective action brief .1
8/6/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/6/2013	DG	4	edit collective action brief 3.3; edit collective action notice .7
8/6/2013	CLER	0.1	Data Entry of contact information of new client
8/6/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#78 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Helen Conley)(Dunn, Matt)
8/6/2013	CLER	0.2	prepare welcome ltr to new client
8/7/2013	AG	0.1	ECF Filing of DECLARATION of Jennifer Dowling in Support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/7/2013	KW	0.3	redact extraneous information from signed retainer .1 scan signed retainer .1 update electronic file .1
8/7/2013	CLER	0.4	verify client information spreadsheet data update client information spreadsheet to include new plaintiffs, contact information and contacts made
8/7/2013	KW	0.6	update Kellogg Plaintiffs' information spreadsheet .3 determine plaintiffs needing intake .2 create chart of plaintiffs needing intake interview and states for follow-up .1
8/7/2013	KW	0.2	respond to request for information .1 open case contact .1

Date	Staff	Amount of Time	Description
8/7/2013	CLER	0.2	prepare welcome ltr to new client
8/7/2013	CLER	0.1	Data Entry of contact information of new client
8/7/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing telephone call form putative class memembr regarding joining .2 add information to case
8/7/2013	KW	0.4	notes .1 process mailing CTS to putative class member .1
8/7/2013	KW	0.1	dg/kw discuss preparation of exhibits for friday filing of collective action application
8/7/2013	CLER	0.1	Data Entry of contact information of new client
8/7/2013	CLER	0.2	prepare welcome ltr to new client
8/7/2013	JP	0.7	fact finding intake and answered questions about her claim and the lawsuit
8/7/2013	DG	0.3	legal research on outside sales .3
8/7/2013	CLER	0.1	create PDF format of documents recd from client
8/7/2013	DG	0.1	dg/kw discuss preparation of exhibits for friday filing of collective action application
8/7/2013	CLER	0.1	Data Entry of contact information of new client
8/7/2013	CLER	0.2	prepare welcome ltr to new client
8/7/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#79 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Frank Gardiner, # (2) Consent to Sue of Scott Kenney, # (3) Consent to Sue of James Sparks)(Dunn, Matt)
8/7/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Frank Gardiner, # (2) Consent to Sue of Scott Kenney, # (3) Consent to Sue of James Sparks)(
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Teresa Maxwell in support of [81] MOTION to Certify a FLSA Collective Action and Issue
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Soliman Sayed in support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Steve S. Moody in support of [81] MOTION to Certify a FLSA Collective Action and Issue
8/8/2013	AG	0.1	ECF Filing of MEMORANDUM to [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	AG	0	ECF Filing of DECLARATION of Vito Vivianoin support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Stephanie Ater in support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Kelly Kivett in support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	AG	0.2	Email Judge Leighton and D's. proposed order with word format
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Patty Thomas fin support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	CLER	0.1	create PDF format of correspondence recd from D. (Initial Disclosures)
8/8/2013	JP	0.5	call to discuss concerns about retaliaton in getting his severance and to ask questions about how the lawsuit will proceed
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Paul Scafede in support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	KW	0.2	jlp/kw review latest information from plaintifffs regarding job duties and time spent on each
8/8/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/8/2013	JP	0.2	jlp/kw review latest information from plaintifffs regarding job duties and time spent on each

Date	Staff	Amount of Time	Description
8/8/2013	KW	0.1	DG/KW/AG- confer about filing collective action motion and exhibits today .1
8/8/2013	AG	0.1	ECF Filing of MOTION to Certify a FLSA Collective Action and Issue Notice by Plaintiff Patty Thomas. (Attachments: # (1) Proposed Order) Noting Date 9/6/2013
8/8/2013	DG	1.1	DG/KW/AG- confer about filing collective action motion and exhibits today .1; final review and correction of all papers to be filed .5; research court's filing rules .5
8/8/2013	AG	0.1	DG/KW/AG- confer about filing collective action motion and exhibits today .1
8/8/2013	CLER	0.1	create PDF format of docs recd from Client
8/8/2013	KW	0.1	respond to plaintiff's request for contact .1
8/8/2013	CLER	0.2	Data Entry of contact information of new client
8/8/2013	JP	0.9	fact finding intake, .5; research on SOL in Massachusetts and Connecticut .3; email results to client .1
8/8/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue. (Attachments: # (1) Consent to Sue of Gregory J. Munkelt, # (2) Consent to Sue of Anthony M. Prince)
8/8/2013	CLER	0.3	prepare welcome ltr to new client
8/8/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#80 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Gregory J. Munkelt, # (2) Consent to Sue of Anthony M. Prince)(Dunn, Matt)
8/8/2013	KW	0.2	draft cover letter to mail consent to sue form and explanation how to join this case .1
8/8/2013	MA	0.2	process mailing of letter and consent to sue .1
8/8/2013	KW	0.8	updating website to keep clients and putative clients informed of case updates
8/8/2013	KW	0.1	initial intake interview .6 add informatin to case notes .1 update client information
8/8/2013	AG	0.1	spreadsheet .1
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Kelley Dye in Support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Robert Gibson in Support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/8/2013	AG	0.1	ECF Filing of DECLARATION of Eleazar Jiminez in support of [81] MOTION to Certify a FLSA Collective Action and Issue Notice
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#90 - DECLARATION of Steve S. Moody filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#88 - DECLARATION of Kelly Kivett filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#89 - DECLARATION of Teresa Maxwell filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#87 - DECLARATION of Eleazar Jiminez filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)

Date	Staff	Amount of Time	Description
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#86 - DECLARATION of Robert Gibson filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#85 - DECLARATION of Kelley Dye filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#81 - MOTION to Certify a FLSA Collective Action and Issue Notice by Plaintiff Patty Thomas. (Attachments: # (1) Proposed Order) Noting Date 9/6/2013, (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#82 - MEMORANDUM filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	DG	0.1	call to ET re research on precollective action discovery .1
8/9/2013	JP	0.8	fact finding intake
8/9/2013	DG	0.2	call from boudreau re motion schedule .2
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#91 - DECLARATION of Soliman Sayed filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#92 - DECLARATION of Paul Scafede filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#94 - DECLARATION of Vito Viviano filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#93 - DECLARATION of Patty Thomas filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#95 - EXHIBIT 1 Notice re [82] Memorandum by Plaintiff Patty Thomas. (Attachments: # (1) Exhibit 2 Postcard, # (2) Exhibit 3 Kellogg's 2011 Annual Report, # (3) Exhibit 4 Special Filing See remarks, # (4) Exhibit 5 History, # (5) Exhibit 6 Sherri Day, Pepsi Bottling Settles Case on Overtime, # (6) Exhibit 7 Notice-Other)(Getman, Dan)
8/9/2013	AG	0.2	ECF Filing of EXHIBIT 1 Notice re [82] Memorandum (Attachments: # (1) Exhibit 2 Postcard, # (2) Exhibit 3 Kellogg's 2011 Annual Report, # (3) Exhibit 4 Special Filing See remarks, # (4) Exhibit 5 History, # (5) Exhibit 6 Sherri Day, Pepsi Bottling Settles Case on Overtime, # (6) Exhibit 7 Notice-Other)
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#84 - DECLARATION of Jennifer Dowling filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/9/2013	CLER	0.2	prepare fedex label from client mailing

Date	Staff	Amount of Time	Description
8/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#83 - DECLARATION of Stephanie Ater filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
8/12/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#97 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Randy Wallace, # (2) Consent to Sue of Mary R. Montoya)(Dunn, Matt)
8/12/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Randy Wallace, # (2) Consent to Sue of Mary R. Montoya)
8/12/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/12/2013	CLER	0.1	Data Entry of contact information of new client
8/12/2013	CLER	0.2	prepare welcome ltr to new client
8/12/2013	CLER	0.2	prepare welcome ltr to new client
8/12/2013	KW	0.2	open case contact .1 respond to request for information .1
8/12/2013	JP	0.5	fact finding intake and discussed questions about joining lawsuit since she signed severance
8/12/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#96 - NOTICE of Hearing: Scheduling Conference set for 8/26/2013 at 09:30 AM in B Courtroom before Judge Ronald B. Leighton. s/Jean Boring as directed by Judge Leighton.(JAB)
8/12/2013	JP	0.7	fact finding intake interview .6; email additional questions for her response, .1
8/12/2013	CLER	0.1	Data Entry of contact information of new client
8/13/2013	CLER	0.1	Data Entry of contact information of new client
8/13/2013	KW	0.5	telephone call from putative class member to discuss concerns about possible retaliation against her retirement benefits from Kellogg if she joins the lawsuit .4 respond to email containing Consent to Sue .1
8/13/2013	JP	1.6	emailed and left voice messages for follow up to see if potential plaintiffs who have made some contact with office want to join the case
8/13/2013	CLER	0.2	prepare welcome ltr to new client
8/13/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#98 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Sherry Zimmerman, # (2) Consent to Sue of Jane I. Hoven)(Dunn, Matt)
8/13/2013	CLER	0.2	prepare welcome ltr to new client
8/13/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Sherry Zimmerman, # (2) Consent to Sue of Jane I. Hoven)
8/13/2013	CLER	0.1	Data Entry of contact information of new client
8/13/2013	JP	0.2	client called to discuss possible list of potential plaintiffs he could find and provide to office
8/13/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/14/2013	KW	0.8	Intital Intake interview .5 open case contact .1 record information in case notes .1 update spreadsheet of plaintiff information .1
8/14/2013	KW	0.3	respond to request for information from putative class member .2 open case contact and add information .1
8/14/2013	KW	0.3	telephone call from plaintiff [ ] regarding payment issues with Kellogg following termination
8/14/2013	KW	0.1	update contact information in electronic file .1
8/14/2013	CLER	0.2	create PDF format of correspondence recd from D. ( D. 1st set of orgs and docs request to P's)

Date	Staff	Amount of Time	Description
8/14/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/14/2013	MA	0.1	call from client [ ]re: case updates
			Transfer documents recd from ECF system to docket file and create file copy(Docket#99 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
8/14/2013	CLER	0.1	Consent to Sue of Stephanie Estel)(Dunn, Matt)
8/14/2013	CLER	0.2	prepare welcome ltr to new client
			ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of
8/14/2013	AG	0.2	Stephanie Estel)
8/14/2013	KW	0.1	telephone call to plaintiff to secure needed contact information .1
8/14/2013	CLER	0.1	Data Entry of contact information of new client
8/14/2013	KW	0.1	update contact information in electronic file .1
8/15/2013	JP	1.6	fact finding intake and focused on possible illegal deductions in car reimbursement plan
8/15/2013	JP	0.5	fact finding intake
8/15/2013	JP	0.2	updated issues spreadsheet with info from intake discussions.
			organize information gathered in interview regarding pay and termination issues .2 add
8/15/2013	KW	0.4	informatin to case notes .1 email to litigation team .1
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
8/15/2013	AG	0.2	Karen Ranuio Matney)
8/15/2013	CLER	0.1	Data Entry of contact information of new client
8/15/2013	CLER	0.2	prepare welcome ltr to new client
8/15/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
			Transfer documents recd from ECF system to docket file and create file copy(Docket#100 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
8/15/2013	CLER	0.1	Consent to Sue of Karen Ranuio Matney)(Dunn, Matt)
8/15/2013	KW	0.1	verify contact information of [ ], new palintiff
8/16/2013	JP	0.1	message for her to call for an intake
8/16/2013	JP	0.1	vm in response to request for information
8/16/2013	JP	0.4	fact finding intake interview
			Transfer documents recd from ECF system to docket file and create file copy(Docket#101 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
8/18/2013	CLER	0.1	Consent to Sue of Daniel Sullivan)(Dunn, Matt)
			md researching motion for protective order concerning deposition and drafting outline
8/19/2013	MD	1.5	for argument 1.5
8/19/2013	MD	0.2	md call with client about changes to deposition 0.2
			ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas.
8/19/2013	AG	0.2	(Attachments: # (1) Consent to Sue of Daniel Sullivan)
			md/kw review case developments -filing Collective action motion and state class
8/19/2013	KW	0.3	amendments .2 discuss need to review defendant's discovery demands .1
8/19/2013	KW	0.1	filing discovery requests
			provided case update and answered his questions about state class in AZ update case
8/19/2013	KW	0.2	notes .1
8/19/2013	KW	0.1	check and verify plaintiff [ ] contact information .1
			md/kw review case developments -filing Collective action motion and state class
8/19/2013	MD	0.3	amendments .2 discuss need to review defendant's discovery demands .1
8/19/2013	KW	0.4	update electronic discovery files for named Plaintiffs: [ ], [ ], [ ] and [ ] .4
			md/ms discussing local counsel's comments about appearing via telephone for
8/19/2013	MD	0.1	scheduling conference with court 0.1



Date	Staff	Amount of Time	Description
			draft explanatory cover email re interrogatories and RFP propounded by defendant .2
8/19/2013	KW	0.3	email pdfs of Discovery demands to named PLT .1
8/19/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
			telephone call from plaintiff to report that latest pay stub shows he is paid hourly
8/19/2013	KW	0.2	discussion of next steps in litigation
8/19/2013	CLER	0.2	prepare welcome ltr to new client
			telephone call to plaintiff to respond to his request for case update .1 update case notes
8/19/2013	KW	0.2	.1
8/19/2013	CLER	0.2	create PDF format of correspondence recd from D. (D. 1st rogs/docs request)
8/19/2013	MD	0.2	md call with defense counsel about scheduling conference and depositions 0.2
			draft explanatory cover email re interrogatories and RFP propounded by defendant .2
8/19/2013	KW	0.3	email pdfs of Discovery demands to named PLT .1
8/19/2013	KW	0.1	update electronic file of initial disclosures .1
			draft explanatory cover email re interrogatories and RFP propounded by defendant .2
8/19/2013	KW	0.3	email pdfs of Discovery demands to named PLT .1
8/19/2013	CLER	0.1	create PDF format of correspondence recd from D. ( deposition notices)
			draft explanatory cover email re interrogatories and RFP propounded by defendant .2
8/19/2013	KW	0.3	email pdfs of Discovery demands to named PLT .1
			md/ms discussing local counsel's comments about appearing via telephone for
8/19/2013	MS	0.1	scheduling conference with court 0.1
8/19/2013	CLER	0.1	Data Entry of contact information of new client
8/20/2013	JP	0.1	MD/JP/KW brief update regarding discovery requests and work in progress to respond .1
8/20/2013	MD	0.1	MD/JP/KW brief update regarding discovery requests and work in progress to respond .1
8/20/2013	KW	0.1	MD/JP/KW brief update regarding discovery requests and work in progress to respond .1
8/20/2013	MD	2	md drafting protective order 2.0
8/20/2013	JP	0.1	voice message in response to internet query
8/20/2013	KW	0.2	draft email to named plaintiff [ ] regarding deposition notice date/place and availability
8/20/2013	JP	0.6	fact finding intake
8/20/2013	KW	0.3	telephone call to named PLT [ ] to discuss deposition notice .2 update case notes .1
8/20/2013	KW	0.1	telephone call to named PLT [ ] to discuss deposition notice
8/20/2013	JP	0.6	fact finding intake
8/21/2013	MD	0.7	md drafting initial disclosures 0.7
8/21/2013	CLER	0.1	Data Entry of contact information of new client
8/21/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/21/2013	CLER	0.2	prepare welcome ltr to new client
			print and process mailing of Interrogatories and Requests for Production of Documents
8/21/2013	CLER	0.1	to named Plaintiff [ ] .1
8/21/2013	DG	0.1	review Hershey RSR overtime case info .1
			print and process mailing of Interrogatories and Requests for Production of Documents
8/21/2013	CLER	0.1	to named Plaintiff [ ] .1
			respond to email from plaintiff regarding availability for deposition .1 email information
8/21/2013	KW	0.2	to attorney .1
			print and process mailing of Interrogatories and Requests for Production of Documents
8/21/2013	CLER	0.1	to named Plaintiff [ ] .1

Date	Staff	Amount of Time	Description
8/21/2013	CLER	0.1	print and process mailing of Interrogatories and Requests for Production of Documents to named Plaintiff [ ] .1
8/21/2013	MD	0.4	md review discovery demands by defendants 0.4
8/21/2013	KW	0.4	MD/JP/KW meet to review Defendnat's discovery requests discuss details of each interrogatory to inform plaintiffs of what is being asked reveiw document requests .4
8/21/2013	KW	0.4	use Abby Fine reader to convert pdfs of Interrogatories and RFPs to Word documents for [ ]- named plaintiffs
8/21/2013	KW	0.2	md/kw confer regarding deposition scheduling .1 discuss tasks to be completed to respond to interrogaotries and Def. RFPs .1
8/21/2013	MD	0.4	MD/JP/KW meet to review Defendnat's discovery requests discuss details of each interrogatory to inform plaintiffs of what is being asked reveiw document requests .4
8/21/2013	JP	0.4	MD/JP/KW meet to review Defendnat's discovery requests discuss details of each interrogatory to inform plaintiffs of what is being asked reveiw document requests .4
8/21/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Rhonda Blanton)
8/21/2013	KW	0.2	telephone call form plaintiff regarding availability for deposition next week .1 email inforamtion to attorney .1
8/21/2013	KW	0.2	telephone call form plaintiff to verify filing of CTS .1 verified filing and mailing of documetn preservation letter .1
8/21/2013	MD	0.2	md/kw confer regarding deposition scheduling .1 discuss tasks to be completed to respond to interrogaotries and Def. RFPs .1
8/21/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#102 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Rhonda Blanton)(Dunn, Matt)
8/21/2013	JP	0.3	discussed developments in hershey case and how that will impact our lawsuit
8/21/2013	KW	0.1	verify contact information in Time Matters system .1
8/22/2013	MD	0.3	md prepare for call with defense counsel about depositions 0.3
8/22/2013	MD	1	md editing initial disclosures 1.
8/22/2013	DG	0.6	md/dg discussing initial conference with court, initial disclosures, and depositions 0.6
8/22/2013	MD	0.2	md/dg call with defense counsel re depositions 0.2
8/22/2013	MD	0.2	md/kw discussing documents plaintiffs have for intial disclosures 0.2
8/22/2013	KW	0.2	md/kw discussing documents plaintiffs have for intial disclosures 0.2
8/22/2013	MD	0.3	md editing amended disclosures 0.3
8/22/2013	DG	0.4	md/dg call with defense counsel re depositions 0.2; review tolling language for stipulation with def counsel re motion for conditional certification .2
8/22/2013	MD	0.2	md review and edit stipulation 0.2
8/22/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#103 - PROPOSED ORDER (Unsigned) re [81] MOTION to Certify a FLSA Collective Action and Issue Notice Parties' Stipulation as to Deadlines Regarding Plaintiff's Motion to Conditionally Certify a FLSA Collective Action and to Issue Notice and Order (Nelson, James)
8/22/2013	JP	0.2	JP/KW review information and documents needed to satisfy defendant's discovery requests in preparation for contacting named plaintiffs .2
8/22/2013	DG	0.1	md/dg discuss topics to cover with defense counsel about depositions 0.1
8/22/2013	KW	0.2	JP/KW review information and documents needed to satisfy defendant's discovery requests in preparation for contacting named plaintiffs .2

Date	Staff	Amount of Time	Description
8/22/2013	MD	0.1	md/dg discuss topics to cover with defense counsel about depositions 0.1
8/22/2013	MD	0.6	md/dg discussing initial conference with court, initial disclosures, and depositions 0.6
8/22/2013	JP	0.2	talk to wife of potential plaintiff about lawsuit
8/22/2013	JP	0.5	called to update me on his situation and discuss retaliation concerns
8/22/2013	JP	0.7	fact finding intake and explain lawsuit
8/23/2013	CLER	0.1	Data Entry of contact information of new client
8/23/2013	CLER	0.2	prepare welcome ltr to new client
8/23/2013	MD	0.1	md/dg discussing Kellogg's discovery requests and plaintiffs' responses 0.1
8/23/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/23/2013	DG	0.1	md/dg discussing Kellogg's discovery requests and plaintiffs' responses 0.1
8/23/2013	DG	0.4	dg/md discuss responses to def's interrogatories to named plaintiffs .2; review def interrogatories and outline response .2
8/23/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of William C. Bowen)
8/23/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#104 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of William C. Bowen)(Dunn, Matt)
8/23/2013	MD	0.2	dg/md discuss responses to def's interrogatories to named plaintiffs .2
8/23/2013	MD	2.0	md preparing discovery demands 2.0
8/23/2013	MD	0.2	md preparing for conference with court 0.2
8/23/2013	MD	0.4	md call with client about discovery demands 0.4
8/23/2013	DG	0.1	edit initial mandatory disclosures .1
8/23/2013	AG	0.2	PCF from individual who indicated he mailed consent to sue (Kathy to called him on Monday)
8/23/2013	MD	0.4	md editing initial disclosures 0.4
8/26/2013	MD	0.4	MD/JP/KW discuss information needed for scheduling conference today
8/26/2013	JP	0.4	MD/JP/KW discuss information needed for scheduling conference today
8/26/2013	JP	0.3	jp/kw review latest consents received to determine states represented for potential state class representatives .2 finalize filing procedure for consents to sue .1
8/26/2013	KW	0.4	MD/JP/KW discuss information needed for scheduling conference today
8/26/2013	JP	0.3	fact finding intake & request new CTS with real signature
8/26/2013	KW	0.3	jp/kw review latest consents received to determine states represented for potential state class representatives .2 finalize filing procedure for consents to sue .1
8/26/2013	KW	0.1	print consent to sue in preparation for ECF filing
8/26/2013	KW	0.1	print consent to sue in preparation for ECF filing
8/26/2013	KW	0.4	initial enquiry be new plaintiff .2 open new contact .1 update case information .1
8/26/2013	KW	0.1	print consent to sue in preparation for ECF filing
8/26/2013	CLER	0.6	receive and print Consent to Sue.1 create pdf for filing ECF .1 telephone call to plaintiff to gather needed address information and brief work history .2 open case contact .1
8/26/2013	JS	0.2	record details of work history .1
8/26/2013	JS	0.2	filed CTS, sent Welcome letter
8/26/2013	JS	0.2	filed CTS, sent Welcome letter
8/26/2013	KW	0.1	review information needed from named plaintiffs to respond to defendant's discovery request to prepare responses
8/26/2013	JS	0.3	KW/JS redact consent, created Noitce of Filing and work through the ECF filing system to consent to sue

Date	Staff	Amount of Time	Description
8/26/2013	JS	0.2	filed CTS, sent Welcome letter
8/26/2013	JS	0.2	filed CTS, sent Welcome letter
8/26/2013	KW	0.3	review litigation team notes regarding our objections and responses to defendant's discovery demands to prepare email to named plaintiffs regarding the demands .1 draft email to [ ] and [ ] regarding completing a diligent search and producing documents and electronic material .2
8/26/2013	JS	0.3	KW/JS redact consent, created Noitce of Filing and work through the ECF filing system to consent to sue
8/26/2013	KW	0.3	KW/JS redact consent, created Noitce of Filing and work through the ECF filing system to consent to sue
8/26/2013	MD	3	md prepare for court conference 3.0
8/26/2013	KW	0.3	KW/JS redact consent, created Noitce of Filing and work through the ECF filing system to consent to sue
8/26/2013	KW	0.3	review litigation team notes regarding our objections and responses to defendant's discovery demands to prepare email to named plaintiffs regarding the demands .1 draft email to [ ] and [ ] regarding completing a diligent search and producing documents and electronic material .2
8/26/2013	MD	0.4	md participate in court conference 0.4
8/26/2013	KW	0.3	KW/JS redact consent, created Noitce of Filing and work through the ECF filing system to consent to sue
8/26/2013	KW	0.3	KW/JS redact consent, created Noitce of Filing and work through the ECF filing system to consent to sue
8/26/2013	JS	0.3	KW/JS redact consent, created Noitce of Filing and work through the ECF filing system to consent to sue
8/26/2013	KW	0.1	print consent to sue in preparation for ECF filing
8/27/2013	MD	1.7	md drafting responses to defendants' interrogatory requests 1.7
8/27/2013	JP	0.1	LT/JP discuss how to determine documents that must be provided by plaintiff for discovery
8/27/2013	MD	1.5	md reviewing and editing responses/objections to defendants discovery demands 1.5
8/27/2013	MD	0.3	md/jp discuss information needed from clients re documents and interrogatories 0.3
8/27/2013	MD	0.2	md drafting AZ class action claims 0.2
8/27/2013	JP	0.3	md/jp discuss information needed from clients re documents and interrogatories 0.3
8/28/2013	KW	0.3	md/kw discuss follow up with client about depositiosn 0.3
8/28/2013	MD	0.3	md/kw discuss follow up with client about depositiosn 0.3
8/28/2013	JS	0.3	filed CTS
8/28/2013	JS	0.3	filed cts
8/28/2013	CLER	0.2	call from client [ ] to update mailing address
8/28/2013	KW	0.1	update Kellogg court docket
8/28/2013	MD	0.2	md speak with defense counsel about depositions 0.2
8/28/2013	MD	1.5	md edit complaint to bring additional claims under AZ and MN state laws 1.5
8/28/2013	MD	1.5	md research state law claims for additional state class actions 1.5
8/28/2013	JS	0.1	welcome letter
8/28/2013	MD	0.1	md email JP and KW about statute of limitations issues for Ohio class 0.1
8/28/2013	MD	0.2	md respond to JP questions for named plaintiff 0.2
8/28/2013	JS	0.1	welcome letter
8/29/2013	MD	0	MD/JP/KW review Interrogatories to determine information needed from named palintiffs at this time- .2

Date	Staff	Amount of Time	Description
8/29/2013	JP	0.4	fact finding intake & answered questions about the lawsuit process
			review information needed for interrogatory responses .1 discuss deposition schedule .1 determine realistic travel arrangements for named plaintiffs coming into NYC from Ohio, Florida and upstate NY .2 decide and assign tasks to accomplish work needed to respond
8/29/2013	KW	0.6	to defendant's discovery demands .2
			Create interrogatories questionnaire to gather information from named plaintiffs to respond to defendant's discovery demands .2 highlight cut and paste document to create
8/29/2013	KW	0.5	a questionnaire for each named plaintiff .3
8/29/2013	CLER	0.1	data entry, updating client list TM and excel file
			telephone call to named plaintiff [ ] to discuss deposition schedule and determine his availability .2 update case notes to record his information .1 create spreadsheet ot track
8/29/2013	KW	0.5	deposition scheduling and preparation .2
			review information needed for interrogatory responses .1 discuss deposition schedule .1 determine realistic travel arrangements for named plaintiffs coming into NYC from Ohio, Florida and upstate NY .2 decide and assign tasks to accomplish work needed to respond
8/29/2013	JP	0.6	to defendant's discovery demands .2
8/29/2013	MA	0.1	call from putative class member to discuss joining
			telephone call to named plaintiff [ ] regarding severance payments she continues to
8/29/2013	KW	0.3	receive .2 update case notes .1
8/29/2013	KW	0.3	email correspondence with named Plaintiff [ ] to determine availabilitiy for depostion .3
8/29/2013	JS	0.4	filing cts
8/29/2013	JS	0.4	filing cts
8/30/2013	MA	0.2	creating shipping labels for client [ ], [ ], [ ] so they can send us documents
8/30/2013	JS	0.1	TC calling about suit
			Transfer documents recd from ECF system to docket file and create file copy(Docket#110 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
9/3/2013	CLER	0.1	Consent to Sue of Bonita Giglio)(Getman, Dan)
9/3/2013	CLER	0.3	prepare welcome ltr to new clients
9/3/2013	CLER	0.2	Data Entry of contact information of new clients
			Transfer documents recd from ECF system to docket file and create file copy(Docket#109 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
9/3/2013	CLER	0.1	Consent to Sue of Erwin Recalde)(Getman, Dan)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#105 - NOTICE of filing Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
			Consent to Sue of James Case, # (2) Consent to Sue of Carl Kowal, # (3) Consent to Sue of
9/3/2013	CLER	0.1	James McCartt, # (4) Consent to Sue of Rhonda Nemitz)(Getman, Dan)
			MD/KW reveiw deposition availiabilty, location and document production for each of 5
9/3/2013	KW	0.4	plaintiffs determine information needed from each
9/3/2013	MD	0.4	md outlining deposition issues to cover with deponents 0.4
			discussion with named plaintiff [ ] about deposition preparation, details of planning for deposition and deposition schedule .4 add information to deposition tracking
9/3/2013	KW	0.6	spreadsheet .1 add information to case notes .1
9/3/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/3/2013	CLER	0.2	prepare welcome ltr to new client
9/3/2013	CLER	0.1	Data Entry of contact information of new client
			MD/KW reveiw deposition availiabilty, location and document production for each of 5
9/3/2013	MD	0.4	plaintiffs determine information needed from each

Date	Staff	Amount of Time	Description
9/3/2013	KW	0.4	review deposition tracking spreadsheet to determine her availability and any issues to discuss .1 review case notes for details of her concerns .1 telephone call to schedule an appointment to discuss plaintiff's concerns about deposition .1 update case information
9/3/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#108 - NOTICE of filing of consent to sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Judy Brashear, # (2) Consent to Sue of David Hayes)(Getman, Dan)
9/3/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#104 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of William C. Bowen)(Dunn, Matt)
9/3/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#106 - ORDER on STIPULATION re [103] Deadlines Re Plaintiffs' Motion to Conditionally Certify a FLSA Collective Action and to Issue Notice and Order: Def's Response due by 9/20/13; Plt's Reply due by 10/3/13; FLSA statute of limitation is tolled for 3 weeks. Signed by Judge Ronald B. Leighton. (DN)
9/3/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#107 - MINUTE ENTRY for proceedings held before Judge Ronald B. Leighton- Dep Clerk: Jean Boring; Pla Counsel: Michael Subit, Matt Dunn (Phone); Def Counsel: James Boudreau, James Nelson; CR: Teri Hendrix; Status Conference held on 8/27/2013. After discussion the Court determines that discovery will be allowed. Court approves the stipulation as to Deadlines Regarding Plaintiff's Motion to Conditionally Certify a FLSA Collective Action and to Issue Notice and Order. Hearing concluded.(JAB)
9/3/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#106 - ORDER on STIPULATION re [103] Deadlines Re Plaintiffs' Motion to Conditionally Certify a FLSA Collective Action and to Issue Notice and Order: Def's Response due by 9/20/13; Plt's Reply due by 10/3/13; FLSA statute of limitation is tolled for 3 weeks. Signed by Judge Ronald B. Leighton. (DN)
9/3/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Michael L. Sparano, # (2) Consent to Sue of Patti Lambert Spain, # (3) Consent to Sue of Deborah M. Vogliardo)
9/3/2013	KW	0.4	review information on tracking spreadsheet and in case notes for each plaintiff noticed for depostion .2 prepare summary of availability and issues related to deposition and email to litigation team .2
9/3/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#111 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael L. Sparano, # (2) Consent to Sue of Patti Lambert Spain, # (3) Consent to Sue of Deborah M. Vogliardo)(Dunn, Matt)
9/4/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Denisse De La Pava-Robles)
9/4/2013	DG	0.1	review email to Boudreau re deposition limits .1
9/4/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#112 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Denisse De La Pava-Robles)(Dunn, Matt)
9/4/2013	MD	0.2	md respond to defense counsel about depositions and discovery 0.2



Date	Staff	Amount of Time	Description
9/4/2013	KW	0.1	open case contact .1
9/4/2013	MD	0.5	md drafting outline for deposition defense 0.5
9/4/2013	DG	0.3	review emails between counsel during the last week I was away on vacation .3
9/4/2013	KW	0.2	draft and email response to request from putative class member for information about this case
9/4/2013	MD	0.6	DG/MD/KW discuss case progress and issues going forward discuss defendant's increasing demand for depositions to include 2 opt-ins determine course of action going forward
9/4/2013	KW	0.6	initial intake interview .4 open case contact .1 update case information .1
9/4/2013	JS	0.1	TC asking for information
9/4/2013	CLER	0.2	prepare welcome ltr to new client
9/4/2013	CLER	0.1	Data Entry of contact information of new client
9/4/2013	KW	0.3	draft email to explain Interrogatories and information needed to respond .2 email explanation and Interrogatory .1
9/4/2013	DG	0.2	md/dg discussing deposition strategy 0.2
9/4/2013	KW	0.7	review 2nd Amended complaint to determine information needed from named plaintiff L. Wisby .2 telephone call to plaintiff L. Wisby to gather information needed .2 add information to draft of 2nd amended complaint .1 summarize information and add to case notes .1 email to attorney .1
9/4/2013	MD	0.7	md drafting 30b6 deposition notice 0.7
9/4/2013	MD	0.5	md drafting document demand 0.5
9/4/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/4/2013	KW	0.3	draft email to explain Interrogatories and information needed to respond .2 email explanation and Interrogatory .1
9/4/2013	MD	0.2	md/dg discussing deposition strategy 0.2
9/4/2013	KW	0.3	draft email to explain Interrogatories and information needed to respond .2 email explanation and Interrogatory .1
9/4/2013	KW	0.3	draft email to explain Interrogatories and information needed to respond .2 email explanation and Interrogatory .1
9/4/2013	KW	0.6	intake interview .4 open case contact .1 add information to case notes .1
9/4/2013	KW	0.1	md/kw discussing Plaintiffs' deposition dates 0.1
9/4/2013	MD	0.1	md/kw discussing Plaintiffs' deposition dates 0.1
9/4/2013	MD	0.4	md drafting proposed schedule for deposition dates 0.4
9/4/2013	KW	0.6	initial intake interview .4 add information to case notes .1 update spreadsheet tracking intake calls .1
9/5/2013	JS	4.3	organizing and scanning docs from plaintiff
9/5/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#113 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Mary L. Brown)(Dunn, Matt)
9/5/2013	MD	0.2	dg/md discuss position to take w DB re discovery disputes pre-collective action certification .2
9/5/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Mary L. Brown)
9/5/2013	DG	0.2	dg/md discuss position to take w DB re discovery disputes pre-collective action certification .2
9/5/2013	MR	0.2	dg/md/kw/mr discuss discovery issues in dispute with def and how to respond .2
9/5/2013	KW	0.6	dg/md/kw discuss possibility of swapping other Plaintiffs as deponents .4; dg/md/kw/mr discuss discovery issues in dispute with def and how to respond .2

Date	Staff	Amount of Time	Description
9/5/2013	KW	0.4	discussion with named plaintiff about reports she was required to submit to employer discussion of electronic data to support work hour claims
9/5/2013	KW	0.2	MD/KW discuss need to push out deposition schedule for a week or more- discuss follow-up needed with plaintiffs .2
9/5/2013	JS	0.3	JS/KW discuss content and organization documents sent by named PLT [ ]-to prepare for scanning and production to defendant .3
9/5/2013	MD	1	dg/md call w def counsel re discovery disputes .4; dg/md/kw discuss possibility of swapping other Plaintiffs as deponents .4; dg/md/kw/mr discuss discovery issues in dispute with def and how to respond .2
9/5/2013	MR	0.2	examine previously discussion ESI-related email
9/5/2013	KW	0.3	JS/KW discuss content and organization documents sent by named PLT [ ]-to prepare for scanning and production to defendant .3
9/5/2013	DG	0.2	revise list of docs to demand from def .2
9/5/2013	KW	0.3	DG/MD/KW discuss latest plaintifffs identified by defendants for depositions.2 determine tasks to reach out to them .1
9/5/2013	MR	0.6	review and edit list of needed documents to present for Def prior to depositions
9/5/2013	MD	0.3	DG/MD/KW discuss latest plaintifffs identified by defendants for depositions.2 determine tasks to reach out to them .1
9/5/2013	KW	0.5	Telephone call to [ ] -plaintiff re-deposition .1 telephone call and email to plaintiff [ ] re deposition .2 telephone call to plaintiff [ ] regarding deposition .1 email to litigation team regarding results of contacts to plaintifffs .1
9/5/2013	KW	0.5	discussion of interrogatory responses .3 discussion of new deposition date .1 update case notes .1
9/5/2013	DG	0.3	DG/MD/KW discuss latest plaintifffs identified by defendants for depositions.2 determine tasks to reach out to them .1
9/5/2013	DG	1	dg/md call w def counsel re discovery disputes .4; dg/md/kw discuss possibility of swapping other Plaintiffs as deponents .4; dg/md/kw/mr discuss discovery issues in dispute with def and how to respond .2
9/5/2013	DG	0.4	review client docs re Kellogg wage, hr, job duties from [ ] .3; review notes of [ ] atty/client communications .1
9/5/2013	MD	1.5	md coordinating with clients about deposition dates 1.5
9/5/2013	MD	0.3	DG/MD/KW discussion of opt-in plaintifffs proposed for depositions- discussion of issues to be explored in depositions determining information needed from plaintiff [ ]
9/5/2013	KW	0.6	fact finding discussion with plaintiff regarding "Primary duty" while employed by defendant .4 organize information and add to case information .2
9/5/2013	CLER	0.1	Data Entry of contact information of new client
9/5/2013	JS	0.3	KW/JS confer re: strategy and context of case
9/5/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/5/2013	CLER	0.2	prepare welcome ltr to new client
9/5/2013	KW	0.3	KW/JS confer re: strategy and context of case
9/5/2013	DG	0.1	email to litigation team re what we need in discovery pre depositions .1
9/6/2013	DG	0.1	review transcript of hearing .1
9/6/2013	MD	0.6	md/dg conference call with defense counsel about depositions and discovery 0.6
9/6/2013	MD	0.3	md/dg discussing deposition scheduling and opposition to 6 depositions 0.3
9/6/2013	DG	0.3	md/dg discussing deposition scheduling and opposition to 6 depositions 0.3
9/6/2013	MD	0.2	md create chart for deposition tracking 0.2
9/6/2013	JS	0.6	scanning in client docs

Date	Staff	Amount of Time	Description
9/6/2013	JS	0.2	TC from client, wants info about Kellogg
9/6/2013	MD	0.1	md email defense counsel deposition dates 0.1
9/6/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#114 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jeannine Crabtree, # (2) Consent to Sue of Thomas Wegrzyn)(Dunn, Matt)
9/6/2013	MR	0.1	email to Dan about missing footnote section in documents request
9/6/2013	MA	0.1	call from client [ ] to confirm receipt of consent to sue
9/6/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/6/2013	CLER	0.2	prepare welcome ltr to new client
9/6/2013	MA	0.1	call to client [ ] to confirm receipt of CTS after checking email
9/6/2013	CLER	0.1	Data Entry of contact information of new client
9/6/2013	JS	1.1	Scanning docs into client folder
9/6/2013	CLER	0.1	Data Entry of contact information of new client
9/6/2013	CLER	0.2	prepare welcome ltr to new client
9/6/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Jeannine Crabtree, # (2) Consent to Sue of Thomas Wegrzyn)
9/6/2013	MD	1.5	md speaking with clients about deposition dates/locations 1.5
9/6/2013	CM	0.1	call from client re time to talk to Matt (.1)
9/6/2013	DG	0.2	supplement email letter to Boudreau re discovery pre depos .2;
9/9/2013	CLER	0.2	prepare welcome ltr to new client
9/9/2013	KW	0.7	jp/kw review case developments for the past week- reveiw new intakes determine tasks to be accomplished discuss paralegal going to Washington State and Columbus Ohio for depositions of named plaintiffs
9/9/2013	MD	0.6	dg/md/jp/kw review deposition schedule and what is needed for each deposition discuss discovery needed to proceed with depsoition schedule
9/9/2013	JP	0.6	dg/md/jp/kw review deposition schedule and what is needed for each deposition discuss discovery needed to proceed with depsoition schedule
9/9/2013	DG	1	dg/md/jp/kw review deposition schedule and what is needed for each deposition discuss discovery needed to proceed with depsoition schedule .6; edit pl request to produce .1; edit pl. interrog .3; edit
9/9/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/9/2013	KW	0.1	initial intake call from putative class member .3 prepare and fax consent form to him .1
9/9/2013	KW	0.4	organize and prepare client documetns for scanning .2 scan .1 update electronic file of client documents .1
9/9/2013	DG	0.7	review and edit proposed amended complaint .7
9/9/2013	JP	0.3	fact finding intake and questions about lawsuit
9/9/2013	KW	0.2	email to plaintitff regarding deposition schedule .1 respond to email questions regarding document production .1
9/9/2013	DG	0.6	edit email to def re predeposition discovery .5; research notes of past calls re def promise to give discovery .1
9/9/2013	JP	0.6	fact finding intake and discussion of concerns re retaliation
9/9/2013	JP	0.7	jp/kw review case developments for the past week- reveiw new intakes determine tasks to be accomplished discuss paralegal going to Washington State and Columbus Ohio for depositions of named plaintiffs
9/9/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Craig Glassman)
9/9/2013	KW	0.5	organize and prepare client documetns for scanning .3 scan .1 update electronic file of client documents .1

Date	Staff	Amount of Time	Description
9/9/2013	MD	0.5	md drafting outline for deposition defense 0.5
9/9/2013	KW	0.2	md/kw discussing deposition schedules 0.2
			dg/md/jp/kw review deposition schedule and what is needed for each deposition
9/9/2013	KW	0.6	discuss discovery needed to proceed with depoition schedule
9/9/2013	MD	0.3	md/dg discussing discovery needed for depositions 0.3
9/9/2013	DG	0.3	md/dg discussing discovery needed for depositions 0.3
9/9/2013	JS	1.5	labeling scanned docs sent from plt
9/9/2013	JP	0.4	fact finding intake
9/9/2013	MD	2	md reviewing kellogg's documents production 2.0
9/9/2013	DG	0.2	draft email response to Boudreau re depo schedule and discovery .2
9/9/2013	MD	0.2	md/kw discussing deposition schedules 0.2
			Transfer documents recd from ECF system to docket file and create file copy(Docket#115 - NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Status Hearing held on 8/26/2013 before Judge Ronald B. Leighton. Parties have ten (10) calendar days to file with the court a Notice of Intent to Request Redaction of this transcript. If no such Notice is filed, the transcript may be made remotely electronically available to the public without redaction after 90 calendar days. Transcript may be viewed at the court public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through PACER. Information regarding the policy can be found on the court's website at <a href="http://www.wawd.uscourts.gov">www.wawd.uscourts.gov</a> . To purchase a copy of the transcript contact court reporter Teri Hendrix by telephone at 53-882-3831. or by e-mail at <a href="mailto:Teri_Hendrix@wawd.uscourts.gov">Teri_Hendrix@wawd.uscourts.gov</a> . . Release of Transcript
9/9/2013	CLER	0.1	Restriction set for 12/5/2013, (Hendrix, Teri)
9/9/2013	CLER	0.1	Data Entry of contact information of new client
9/10/2013	DG	0.4	edit letter to boudreau re deficient pre-deposition discovery .4
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
9/10/2013	AG	0.2	Ryan Fiser, # (2) Consent to Sue of Dennison D. Tieman)
9/10/2013	KW	0.2	download disc of documents produced by defendant .2
9/10/2013	CLER	1.9	create PDF format of documents recd from client
9/10/2013	KW	0.6	work on redacting and bates stamping plaintiffs' documents for production .6
			MD/Kw review documents produced by defendant Compare production to defendant's
9/10/2013	KW	0.2	promised production
			called to let him know we do not need him to do a deposition, .2 and he shared ideas
9/10/2013	JP	0.3	about publicizing the lawsuit to the general public .1
			MD/Kw review documents produced by defendant Compare production to defendant's
9/10/2013	MD	0.2	promised production
9/10/2013	KW	0.1	send email to plaintiff regarding his document production .1
			DG/MD/KW review missing document production .1 determine next steps in securing
9/10/2013	KW	0.2	promised production .1
			organize documents sent by named plaintiff [ ] .2 organize and file documents sent by
9/10/2013	CLER	0.4	plaintiff [ ] .1 file documents send by named plaintiff [ ] .1
9/10/2013	KW	0.2	verify contact information .1 update consent to sue file .1
9/10/2013	KW	0.6	Index documents produced by defendant .6
9/10/2013	CLER	0.2	Data Entry of contact information of new clients
9/10/2013	MD	0.1	md review email from defense counsel 0.1
9/10/2013	CLER	0.3	prepare welcome ltr to new clients
9/10/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing

Date	Staff	Amount of Time	Description
9/10/2013	KW	0.7	review and read document production of defendant to determine job descriptions, pay compensation policy and what discovery is missing .6 report to attorney .1
9/10/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#116 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Craig Glassman)(Dunn, Matt)
9/10/2013	DG	0.2	DG/MD/KW review missing document production .1 determine next steps in securing promised production .1
9/10/2013	MD	0.2	DG/MD/KW review missing document production .1 determine next steps in securing promised production .1
9/10/2013	KW	0.3	telephone call re documents production .1 discussion of details regarding depo preparation .1 update case notes .1
9/10/2013	JP	0.3	draft clause construction declaration re lease signing
9/10/2013	CLER	0.1	create PDF format of correspondence recd from D. ( CD of documents)
9/10/2013	MD	1.5	md reviewing plaintiffs documents for production 1.5
9/10/2013	JP	0.3	called to discuss problem with defendant re hours worked and doctor's note
9/10/2013	MD	1.5	md prepare interrogatory and document demand responses for kellogg's discovery demands 1.5
9/10/2013	KW	0.7	prepare documents for Bates stamping .4 Bates Stamp documents for production to defendant in response to defendant's discovery requests .3
9/10/2013	MD	0.4	md edit letter to defense counsel about outstanding discovery/documents 0.4
9/11/2013	CLER	1.3	Organize documents of named plaintiff [ ] for Bates Stamping and production to defendant .6 merge into segments to be produced .3 Redact as needed .2 Bates Stamp .1 forward to attorney for final review .1
9/11/2013	MD	2	md reviewing documents to produce to defense counsel 2.0
9/11/2013	CLER	0.1	create PDF format of correspondence recd from D. ( CD of documents)
9/11/2013	MD	2	md preparing discovery responses to defendants 2.0
9/11/2013	JS	0.2	convert files to pdf for redaction and production
9/11/2013	MD	0.5	md send defense counsel discovery 0.5
9/11/2013	DG	0.3	md/dg/jp discussing deposition schedules 0.3
9/11/2013	JP	1.2	redact documents for document production
9/11/2013	MD	0.3	md/dg/jp discussing deposition schedules 0.3
9/11/2013	MD	0.3	md/dg call with local counsel about discovery 0.3
9/11/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#117 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Ryan Fiser, # (2) Consent to Sue of Dennison D. Tieman)(Dunn, Matt)
9/11/2013	JP	0.3	md/dg/jp discussing deposition schedules 0.3
9/11/2013	DG	0.3	md/dg call with local counsel about discovery 0.3
9/11/2013	KW	0.3	telephone call from plaintff regarding his recent communications with HR .2 update case notes .1
9/11/2013	JP	0.5	fact finding intake and answered questions about lawsuit
9/11/2013	DG	0.4	md/dg conference call with defense counsel re discovery and depositions 0.4
9/11/2013	KW	2.2	organize, consolidate and Bates stamp documents for production to defendant
9/11/2013	JP	0.3	fact finding intake
9/11/2013	CLER	1.3	Organize documents of named plaintiff [ ] for Bates Stamping and production to defendant .6 merge into segments to be produced .3 Redact as needed .2 Bates Stamp .1 forward to attorney for final review .1
9/11/2013	JP	0.6	discuss documentation of hours he worked for defendants, discussed facts of employment

Date	Staff	Amount of Time	Description
9/11/2013	MD	0.4	md/dg conference call with defense counsel re discovery and depositions 0.4
9/11/2013	DG	1	edit defendants' proposed confidentiality order 1
9/11/2013	JS	0.6	redaction of docs for production
9/12/2013	JS	2.5	js/md/kw meet to plan organizing, preparing, bates stamping, redacting plaintiffs' documents to respond to def. discovery demands
9/12/2013	MD	0.1	md send defense counsel additional documents in response to discovery demands 0.1
9/12/2013	MD	2.5	js/md/kw meet to plan organizing, preparing, bates stamping, redacting plaintiffs' documents to respond to def. discovery demands
9/12/2013	JS	1	redact and bates stamp docs for production
9/12/2013	JS	0.1	email to MD re: docs defense did not receive
9/12/2013	CLER	0.2	prepare FedEx label from client making of documents
9/12/2013	MD	0.3	md review clients' documents for production 0.3
9/12/2013	MD	0.7	md review and edit confidentiality agreement 0.7
9/12/2013	AG	0.2	register Dunn for Greenberg Taurig online services (to review documents)
9/12/2013	KW	0.5	call to client [ ] to discuss deposition arrangements, deposition preparation, declaration, in response to def. discovery demands .4 updating case notes .1
9/12/2013	KW	2.5	js/md/kw meet to plan organizing, preparing, bates stamping, redacting plaintiffs' documents to respond to def. discovery demands
9/12/2013	MD	0.8	dg/md/jlp/kw meet to prepare for depositions for four named plaintiffs and two opt-ins, proof issues, and travel arrangements
9/12/2013	DG	0.8	dg/md/jlp/kw meet to prepare for depositions for four named plaintiffs and two opt-ins, proof issues, and travel arrangements
9/12/2013	KW	0.5	call to client [ ] to discuss deposition arrangements, declaration, deposition prep, in response to def. discovery demands .4 updating case notes .1
9/12/2013	JP	0.8	dg/md/jlp/kw meet to prepare for depositions for four named plaintiffs and two opt-ins, proof issues, and travel arrangements
9/12/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#118 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Joseph W. Wellweber, # (2) Consent to Sue of Doug Byrd, # (3) Consent to Sue of Susan Litcrell)(Dunn, Matt)
9/12/2013	DG	0.8	dg/md/jlp/kw meet to prepare for depositions for four named plaintiffs and two opt-ins, proof issues, and travel arrangements
9/12/2013	CLER	0.2	prepare welcome ltr to new client
9/12/2013	CLER	0.1	Data Entry of contact information of new client
9/12/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Joseph W. Wellweber, # (2) Consent to Sue of Doug Byrd, # (3) Consent to Sue of Susan Litcrell)
9/12/2013	CLER	0.1	Data Entry of contact information of new client
9/12/2013	CLER	0.1	Data Entry of contact information of new client
9/12/2013	JS	0.8	scan [client] docs
9/12/2013	DG	0.5	edit confidentiality order .5
9/12/2013	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/12/2013	JP	0.8	dg/md/jlp/kw meet to prepare for depositions for four named plaintiffs and two opt-ins, proof issues, and travel arrangements
9/12/2013	KW	0.5	call to client [ ] to discuss deposition arrangements, deposition prep, declaration, in response to def. discovery demands .4 updating case notes .1
9/12/2013	JP	0.8	dg/md/jlp/kw meet to prepare for depositions for four named plaintiffs and two opt-ins, proof issues, and travel arrangements



Date	Staff	Amount of Time	Description
9/12/2013	KW	0.8	dg/md/jlp/kw meet to prepare for depositions for four named plaintiffs and two opt-ins, proof issues, and travel arrangements
9/12/2013	JS	0.1	KW/JS discuss T: file organization
9/12/2013	CLER	0.2	prepare welcome ltr to new client
9/12/2013	CLER	0.2	prepare welcome ltr to new client
9/12/2013	JS	1	scanning [client] docs
9/13/2013	MA	0.1	call from client [ ] to confirm consent to sue
9/13/2013	MD	0.5	md research outside sales caselaw 0.5
9/13/2013	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/13/2013	CLER	0.1	Data Entry of contact information of new client
9/13/2013	CLER	0.2	prepare welcome ltr to new client
9/13/2013	JS	0.5	scanning docs
9/13/2013	MD	0.6	md reviewing kellogg's document production 0.6
9/13/2013	MR	0.3	assist para JS with zipping contents of client production and use of Send6 FTP .2, check on send6 features/limitations .1
9/13/2013	DG	0.4	md/dg discussing kellogg's place of business for the outside sales exemption 0.3; review extension stip .1; email to def re proposed 30b6 date
9/13/2013	DG	0.3	prepare outline for depo preparation for clients .3
9/13/2013	CLER	0.2	Data Entry of contact information of new clients
9/13/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Darrell Farren, # (2) Consent to Sue of Kimberly Waymoth, # (3) Consent to Sue of Sherri Harris, # (4) Consent to Sue of Tammy L. Blaha)
9/13/2013	MD	0.5	md reviewing documents produced by defense counsel 0.5
9/13/2013	DG	1	email client to set up depo preparation .1; research travel plans for 30b6 deposition .6; emails to [client] to find time to set up her depo prep .2; email to Boudreau re relation back .1
9/13/2013	JS	0.1	streamlining files/ naming conventions
9/13/2013	MD	0.7	md drafting outline for deposition prep of plaintiffs 0.7
9/13/2013	MD	0.6	md review and send documents to defense counsel from plaintiffs 0.6
9/13/2013	MR	0.7	JP/MR laptop preparation and review for forthcoming depositions
9/13/2013	JS	0.3	update client file index for new [client] and [client] docs
9/13/2013	MD	0.1	md call and email client about deposition date 0.1
9/13/2013	JS	0.5	researching hotel and flight information for [client] depo travel plans
9/13/2013	MD	0.1	dg/md discuss JB's decision not to consent to amendment of claims .1
9/13/2013	DG	0.1	dg/md discuss JB's decision not to consent to amendment of claims .1
9/13/2013	CLER	0.2	prepare welcome ltr to new client
9/13/2013	JS	0.2	email to MR about compression; compress CD
9/13/2013	JP	0.2	md/dg discussing kellogg's place of business for the outside sales exemption 0.3 (mr/jp 0.2)
9/13/2013	MD	0.2	md coordinate dates for plaintiffs depositions and inform defense counsel of dates 0.2
9/13/2013	MD	0.2	md review and edit stipulation re extension of time 0.2
9/13/2013	MR	0.2	md/dg discussing kellogg's place of business for the outside sales exemption 0.3 (mr/jp 0.2)
9/13/2013	CLER	0.1	Data Entry of contact information of new client
9/13/2013	MD	0.5	md reviewing defedants' discovery production 0.5
9/13/2013	MD	0.3	md/dg discussing kellogg's place of business for the outside sales exemption 0.3 (mr/jp 0.2)
9/13/2013	JS	0.5	research travel arrangements for [client]
9/13/2013	MR	0.2	initial prep of para JP's laptop for deposition travel

Date	Staff	Amount of Time	Description
9/13/2013	JS	1	scanning docs from plt
9/13/2013	CLER	0.3	prepare welcome ltr to new clients
9/13/2013	MD	0.4	md speak with opt-in about case 0.4
9/13/2013	JP	0.7	JP/MR laptop preparation and review for forthcoming depositions
9/13/2013	MD	0.2	md responding with defense counsel about amending complaint 0.2
9/13/2013	MD	0.2	md review edits to confidentiality agreement 0.2
9/13/2013	JS	0.1	TC from MR re: SEND6 guidance
			Transfer documents recd from ECF system to docket file and create file copy(Docket#121 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
9/16/2013	CLER	0.1	Consent to Sue of Julie Kohlman)(Dunn, Matt)
9/16/2013	JS	0.2	TC discuss travel plans--will email information and call to follow up
			Transfer documents recd from ECF system to docket file and create file copy(Docket#120 - STIPULATION AND PROPOSED ORDER AS TO DEADLINES REGARDING PLAINTIFFS' MOTION TO CONDITIONALLY CERTIFY A FLSA COLLECTIVE ACTION AND TO ISSUE NOTICE by parties re [81] MOTION to Certify a FLSA Collective Action and Issue Notice. (Nelson,
9/16/2013	CLER	0.1	James)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#119 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
			Consent to Sue of Darrell Farren, # (2) Consent to Sue of Kimberly Waymoth, # (3)
9/16/2013	CLER	0.2	Consent to Sue of Sherri Harris, # (4) Consent to Sue of Tammy L. Blaha)(Dunn, Matt)
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
9/16/2013	AG	0.2	Julie Kohlman)
9/16/2013	MD	0.4	md researching past resarch on mt. clemens pottery and recording hours worked 0.4
9/16/2013	CLER	0.3	prepare welcome ltr to new clients
9/16/2013	MD	0.3	md speaking with client about deposition 0.3
9/16/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/16/2013	JS	1	hotel reservation / airfare
9/16/2013	MD	0.2	md/js discussing transporation for plainitff to nyc 0.2
9/16/2013	JS	0.3	receiving and labeling Defendant's production responses / email to MD
9/16/2013	JS	0.2	md/js discussing transporation for plainitff to nyc 0.2
			md/jp/js discussing discovery production, deposition schedules, and tasks to complete
9/16/2013	MD	0.4	for deposition prep of clients 0.4 (js 0.2)
			md/jp/js discussing discovery production, deposition schedules, and tasks to complete
9/16/2013	JP	0.4	for deposition prep of clients 0.4 (js 0.2)
9/16/2013	CLER	0.3	create PDF format of documents recd from D. ( amended notice of depositions)
9/16/2013	JS	0.5	researching travel plans for [client]
			JS/CM discuss billing and CC protocols for GS travel arrangements / receipts /
9/16/2013	CM	0.1	bookkeeping
			md/jp/js discussing discovery production, deposition schedules, and tasks to complete
9/16/2013	JS	0.2	for deposition prep of clients 0.4 (js 0.2)
9/16/2013	MD	4	md review kellogg's document production 4.0
9/17/2013	CLER	0.2	Data Entry of contact information of new client
9/17/2013	MD	4	md reviewing documents in preparation for plaintiffs depositions 4.0
			Transfer documents recd from ECF system to docket file and create file copy(Docket#122 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
9/17/2013	CLER	0.1	Consent to Sue of Lisa Friedrich, # (2) Consent to Sue of Jonathan Suchon)(Dunn, Matt)

Date	Staff	Amount of Time	Description
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Lisa
9/17/2013	AG	0.2	Friedrich, # (2) Consent to Sue of Jonathan Suchon)
9/17/2013	CLER	0.3	prepare welcome ltr to new client
9/17/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/17/2013	JP	0.2	JP/MR discuss search work needed to be done regarding plaintiff's email store
9/17/2013	MR	0.2	sampled search on dtsearch index of plaintiff's emails
9/17/2013	MR	0.2	start dtsearch reindexing on msg files
			create dtsearch index to search on plaintiffs email store .4, test index .1, redo index with
9/17/2013	MR	0.7	pst copied to external drive .2
9/17/2013	MR	0.2	JP/MR discuss search work needed to be done regarding plaintiff's email store
			ma/jlp create FedEx label to send to client [ ] so he can send us documents in preparation
9/17/2013	MA	0.1	for his deposition
			ma/jlp create FedEx label to send to client [ ] so he can send us documents in preparation
9/17/2013	JP	0.1	for his deposition
9/17/2013	CLER	0.1	create PDF format of correspondence recd from D. (CD of documents)
9/17/2013	MR	0.6	JP .7/DG .6/MD .5/MR .6 discussion about client email production and depositions
9/17/2013	MD	0.2	md/dg/jp discussing documents to send to client for deposition prep 0.
			md/dg/jp discussing documents to send to client for deposition prep .2; review docs for
9/17/2013	DG	1.2	client prep 1
			dg/jp prepare [client] for deposition 2.5; prepare written outline to send to clients re
9/17/2013	DG	2.8	elements of claim in the case .3
9/17/2013	MD	0.2	md speaking with client about waiver of claims under severance agreement 0.2
9/17/2013	MR	0.5	initial attempt to obtain emails from plaintiffs msn account using mailstore
9/17/2013	CLER	0.1	data entry--adding emails to TM
9/17/2013	JP	2.5	dg/jp prepare [client] for deposition 2.5
9/17/2013	JP	0.2	md/dg/jp discussing documents to send to client for deposition prep 0.
9/17/2013	MR	0.4	extracted msg files from plaintiff email pst to facilitate searching for useful documents
9/17/2013	MR	0.1	start mailstore export to pst
9/17/2013	MR	0.3	test and brief search of msg files using dtsearch
9/17/2013	MR	0.1	exchange emails with para JP regarding plaintiffs email info to obtain emails
9/17/2013	DG	0.6	JP .7/DG .6/MD .5/MR .6 discussion about client email production and depositions
9/17/2013	JP	0.7	JP .7/DG .6/MD .5/MR .6 discussion about client email production and depositions
9/17/2013	MD	0.5	JP .7/DG .6/MD .5/MR .6 discussion about client email production and depositions
			md/dg discussing scafede's underlying facts for deposition prep call 0.1; edit motion to
9/18/2013	DG	0.6	amend .5
9/18/2013	CM	0.1	MR/CM discuss review of client emails using DTsearch (.1)
9/18/2013	MR	0.1	MR/CM discuss review of client emails using DTsearch (.1)
9/18/2013	JS	0.2	JS/MR review process of using bulk renamer to produce client emails to Def
9/18/2013	JP	2	DG/JP deposition prep of client
9/18/2013	MR	0.2	JS/MR review process of using bulk renamer to produce client emails to Def
			MR/JP computer prep & training for deposition .4; review issues related to production of
9/18/2013	MR	0.6	emails .2
9/18/2013	DG	2	DG/JP deposition prep of client

Date	Staff	Amount of Time	Description
9/18/2013	MR	3	prep flash drive with encrypted volume of all case data for para JP for use at depositions 1.7; prep laptop for JP at depositions .3; test access to OWA, Logmein, and encrypted data .2, copy extracted client msg files to server .4, separate msg files that need to be produced .2, prep bulk renamer to be used for msg to be produced to Def .2
9/18/2013	DG	0.1	dg/md/jp debrief depo preps today and client assesment .1
9/18/2013	MD	0.2	md sending defense counsel additional documents 0.2
9/18/2013	DG	1.5	dg/jp depo preparation with [client] 1.5
9/18/2013	JP	0.1	dg/md/jp debrief depo preps today and client assesment .1
9/18/2013	MD	0.1	dg/md/jp debrief depo preps today and client assesment .1
9/18/2013	MD	0.1	md/jp discussing email production to kellogg 0.1
9/18/2013	MD	0.1	md/mr discussing email production to kellogg 0.1
9/18/2013	JP	0.1	md/jp discussing email production to kellogg 0.1
9/18/2013	DG	1	prepare [client] for her deposition 1
9/18/2013	MR	0.1	md/mr discussing email production to kellogg 0.1
9/18/2013	MD	0.3	md review documents to produce to kellogg 0.3
9/18/2013	MR	0.1	md/mr discuss need to get client production of emails to Def by tomorrow
9/18/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#122 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Lisa Friedrich, # (2) Consent to Sue of Jonathan Suchon)(Dunn, Matt)
9/18/2013	MD	0.1	md/dg discussing [client]'s underlying facts for deposition prep call 0.1
9/18/2013	JS	0.3	downloading and organizing defense production documents
9/18/2013	MD	2.5	dg/jp/md depo preparation with [client] 2.5
9/18/2013	JP	2.5	dg/jp/md depo preparation with [client] 2.5
9/18/2013	JP	0.6	MR/JP computer prep & training for deposition .4; review issues related to production of emails .2
9/18/2013	DG	2.5	dg/jp/md depo preparation with [client] 2.5
9/18/2013	MD	2	md drafting motion to amend 2
9/18/2013	JS	0.1	email cancelling appt with MD / spoke with MD will call to reschedule
9/18/2013	MD	0.2	md sending defense counsel emails about documents for depositions 0.2
9/19/2013	JS	0.2	TC from MR about electronic file transfer--production
9/19/2013	CLER	0.2	prepare welcome ltr to new client
9/19/2013	CLER	0.1	Data Entry of contact information of new client
9/19/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Jeffery Thomas Anthony)
9/19/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#123 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jeffery Thomas Anthony)(Dunn, Matt)
9/19/2013	JS	0.2	TC to Skyline hotel to confirm reservation for [client]
9/19/2013	MD	0.4	md providing defense counsel with delcaration and additional documents for discovery 0.4
9/19/2013	MD	0.2	md/dg discussing follow up with defense cousnel about confidentiality agreement and discussing defense of depositions 0.2
9/19/2013	JS	0.1	email to MD re: bates stamping and renaming emails
9/19/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/19/2013	JS	0.1	email to MR about Send6 utility--username and p/w
9/19/2013	JS	0.5	renaming and bates-stamping [client] emails with bulk renaming utility for production to defense

Date	Staff	Amount of Time	Description
9/19/2013	JS	0.3	zipping and archiving email files to produce by online file transfer
9/19/2013	DG	0.5	call with JB re confidentiality order terms .4; email re same to Jim .1
9/19/2013	JP	7	travel to Columbus Ohio for deposition
9/19/2013	MD	0.2	md review dg edits to motion to amend complaint 0.2
			md/dg discussing follow up with defense counsel about confidentiality agreement and
9/19/2013	DG	0.2	discussing defense of depositions 0.2
9/19/2013	JS	0.1	revised email to [client] re: travel plans
9/19/2013	MD	0.3	md prepare for call with client about deposition 0.3
9/19/2013	DG	0.2	review confidentiality dispute .1; email to def counsel re same .1
			consolidation travel information and sending itinerary to [client] for depo in mon, 9-23-
9/19/2013	JS	0.3	2013
9/19/2013	MR	0.1	assist para JS with use of Send6
9/20/2013	JS	0.1	checking GT production for [client] personnel file
9/20/2013	DG	0.1	md/dg discussing letter to defense counsel about concerted activity 0.1
9/20/2013	MD	0.2	md calling client re deposition 0.2
9/20/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/20/2013	MD	1.3	md preparing client for deposition 1.3
9/20/2013	CLER	0.2	prepare welcome ltr to new client
			md finalizing motion for filing motion to amend complaint, including reviewing amended
9/20/2013	MD	1	complaint 1.0
9/20/2013	MD	4	md participate on deposition of Plaintiff [ ]
9/20/2013	CLER	0.1	Data Entry of contact information of new client
9/20/2013	JS	0.5	finling motion of amend to amend complaint
9/20/2013	CLER	0.2	create PDF format of documents recd from client
9/20/2013	CM	0.1	call from client re docs sent (.1)
9/20/2013	JS	0.1	TC from Skyline Hotel confirming reservation
			pre-deposition preparation with client and DG on phone 1.0; assist with deposition 4.5;
9/20/2013	JP	15.5	travel to west coast for next deposition 10.0
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Coy
9/20/2013	AG	0.2	Knights)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#124 -
			NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
9/20/2013	CLER	0.1	Consent to Sue of Coy Knights)(
9/20/2013	JS	0.3	call and email to Skyline Hotel to confirm reservation for deponent
			depo prep with [client] .6; deposition 10am - 2:10 (4.2) with prep during breaks; call to
9/20/2013	DG	5	debrief w Janice in prep for next couple depositions .2
			prepare letter to J Boudreau re NLRA prohibition on questioning over coworker
9/20/2013	DG	0.5	communications about joining the case .5
			Call to WA west. dist court clerk confirming second friday or thrid friday motion to
9/20/2013	JS	0.2	amend complaint
9/20/2013	MD	0.1	md/dg discussing letter to defense counsel about concerted activity 0.1
9/23/2013	CM	0.1	phone call with JP re how to handle calls this week (.1)
9/23/2013	CLER	0.2	create PDF format of documents recd from D. (depositions notices)
9/23/2013	JP	5	travel to Seattle 4.0; review [client] documents for deposition 1.0
9/23/2013	CLER	0.1	Data Entry of contact information of new client
9/23/2013	CLER	0.2	prepare welcome ltr to new client
9/23/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing

Date	Staff	Amount of Time	Description
9/23/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#127 - ORDER on STIPULATION re [120] Stipulation, filed by Kellogg Company, Kellogg Sales Company re [81] MOTION to Certify a FLSA Collective Action and Issue Notice; response and reply dates are set forth in this order, and the Motion is renoted for 10/25/2013. Signed by Judge Ronald B. Leighton. (DN)
9/23/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#126 - MEMORANDUM filed by Plaintiffs Jennifer Dowling, Kelley Dye, Jr, Robert Gibson, Patty Thomas re [125] MOTION to Amend [56] Amended Complaint, (Getman, Dan)
9/23/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#125 - MOTION to Amend [56] Amended Complaint, by Plaintiffs Jennifer Dowling, Kelley Dye, Jr, Robert Gibson, Patty Thomas. Oral Argument Requested. (Attachments: # (1) Proposed Order, # (2) Exhibit) Noting Date 10/11/2013, (Getman, Dan)
9/23/2013	MA	0.1	call from client [ ] re: merchandising v. sales .2 updating case notes .1
9/23/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#128 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Gary Pulling)(Dunn, Matt)
9/23/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Gary Pulling)
9/23/2013	DG	0.3	calls from MD to debrief what occurred at [client] and [client] depositions today in NYC .3
9/23/2013	MD	13.5	travel to/from deposition 6; defend deposition 7.5
9/23/2013	JS	0.2	drafting email to Judge (doc version of proposed order to amend amended complaint) defend deposition 4.0; travel to/from deposition 5.5; meet with client before deposition
9/24/2013	MD	10	to discuss deposition 0.5
9/24/2013	MA	0.1	call from client [ ] to confirm details of today's deposition
9/24/2013	DG	0.7	gather docs and depo materials for depo .1; depo prep w [client] .6
9/24/2013	MD	3.8	md prepare clients for depositions 3.8
9/24/2013	DG	6	deposition of [client] 12-6 (meetings with client during breaks)
9/24/2013	MD	0.5	md review documents to prepare clients for deposition 0.5
9/24/2013	CLER	0.2	prepare welcome ltr to new client
9/24/2013	MA	0.3	call from putative class member to discuss joining .2 updating case notes .1
9/24/2013	CLER	0.1	Data Entry of contact information of new client
9/24/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/24/2013	MD	2.5	prepare client for deposition
9/24/2013	CLER	0.2	prepare welcome ltr to new client
9/24/2013	CLER	0.1	Data Entry of contact information of new client
9/25/2013	DG	0.3	md/dg discussing arguments to rebut Kellogg's opposition to Plaintiffs' motion for conditional certification, including discovery needed and taken 0.3
9/25/2013	MR	0.2	md/mr discussing results of plaintiffs' deposition
9/25/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of Jeff Postma, # (2) Consent to Sue of Tammy Ward, # (3) Consent to Sue of Christopher Vaughn)
9/25/2013	MD	0.3	md/dg discussing arguments to rebut Kellogg's opposition to Plaintiffs' motion for conditional certification, including discovery needed and taken 0.3



Date	Staff	Amount of Time	Description
9/25/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#129 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jeff Postma, # (2) Consent to Sue of Tammy Ward, # (3) Consent to Sue of Christopher Vaughn)(Dunn, Matt)
9/25/2013	MD	0.2	md/mr discussing results of plaintiffs' deposition
9/25/2013	MD	0.2	md create todo list of activities for case 0.2
9/25/2013	JP	8	Travel to Tuscon for deposition
9/25/2013	CLER	0.1	Data Entry of contact information of new client
9/25/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/25/2013	CLER	0.2	prepare welcome ltr to new client
9/26/2013	MA	0.5	organizing documents produced by def Kellogg in order to share with litigation team
9/26/2013	JP	3.9	prepare client for deposition 1.0; deposition 12:30 -2:50 (2.4); final debrief w client .5
9/26/2013	DG	3.6	review [client] information for depo prep .3; prepare client for deposition .8; deposition 12:30 -2:50 (2.4); final debrief w client .1
9/26/2013	JP	7	Assist in depostion, including 1.0 pre-deposition meeting 5 hours deposition with breaks 1 hr meeting with client to discuss status of case following depositions
9/26/2013	CLER	0.2	create PDF format of correspondence recd from D. (CD containing documents)
9/26/2013	MR	0.1	read and reply atty DG email regarding image pdf production
9/27/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/27/2013	CLER	0.1	Data Entry of contact information of new client
9/27/2013	CLER	0.2	prepare welcome ltr to new client
9/27/2013	DG	0.3	edit email demand for native email production .3
9/27/2013	MD	0.3	md reviewing discovery demands to kellogg and draft email about outstanding ESI 0.3
9/27/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Kurt Pfeffer)
9/27/2013	DG	0.6	draft 30b6 deposition outline .6
9/27/2013	MA	0.2	posting case update to Getman Sweeney Facebook page to keep class members informed of updates
9/27/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#130 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kurt Pfeffer)(Dunn, Matt)
9/27/2013	MD	0.2	md review website posting 0.2
9/27/2013	MD	0.2	md call with potential opt-in about joining litigation 0.2
9/27/2013	JP	12.5	return travel from deposition in Tucson
9/27/2013	MD	0.2	md/dg discussing Kellogg's production of ESI in nonsearchable pdf format and 30b6 deposition 0.2
9/27/2013	MR	0.1	read and reply to email from attys re: Def production in image rather than native
9/27/2013	DG	0.2	md/dg discussing Kellogg's production of ESI in nonsearchable pdf format and 30b6 deposition 0.2
9/30/2013	CLER	0.2	Data Entry of contact information of new clients
9/30/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/30/2013	CLER	0.3	prepare welcome ltr to new clients

Date	Staff	Amount of Time	Description
9/30/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#131 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Monte Nevills, # (2) Consent to Sue of Reuben J. Garza)(Dunn, Matt)
9/30/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Monte Nevills, # (2) Consent to Sue of Reuben J. Garza
10/1/2013	JP	0.8	fact finding intake
10/1/2013	JP	0.3	brief fact finding discussion, past SOL, .1; research on Illinois SOL for wage and hour .2
10/1/2013	MR	0.3	download sizeable Def production from Def FTP site .3
10/1/2013	AG	0.2	Arrange Court Reporter (30(b)(6)
10/2/2013	JP	0.4	jp/kw review deposition results of 3 plaintiff depositions- [ ], [ ] and [ ]
10/2/2013	KW	0.4	jp/kw review deposition results of 3 plaintiff depositions-[ ], [ ] and [ ]
10/2/2013	DG	0.6	dg/jp/kw/md [left early] meeting to discuss document review necessary for 30b6 depo .6
10/2/2013	MD	0.5	dg/jp/kw/md [left early] meeting to discuss document review necessary for 30b6 depo .5
10/2/2013	KW	0.6	dg/jp/kw/md [left early] meeting to discuss document review necessary for 30b6 depo .6
10/2/2013	JP	0.6	dg/jp/kw/md [left early] meeting to discuss document review necessary for 30b6 depo .6
10/2/2013	DG	0.5	edit 30b6 notice for amended notice .4; email re same to def .1
10/2/2013	KW	3.3	review docments produced by defendant in preparation for 30(b)(6) depositions 2.1 prepare index to provide efficeint access to documents by litigation team 1.2
10/3/2013	KW	0.3	Draft explanatory letter .2 prepare mailing of transcript and Errata sheets to deponent [ ] .1
10/3/2013	MR	0.3	assist paras with adobe acrobat reader features to marking pdfs
10/3/2013	JS	0.4	JS/KW organize and transfer files to storage .4
10/3/2013	KW	0.3	Draft explanatory letter .2 prepare mailing of transcript and Errata sheets to deponent P. Scafede .1
10/3/2013	KW	0.3	download deposition transcript of plaintiff [ ] .1 prepare transcript and Errata sheet to be mailed to deponent for review .2
10/3/2013	AG	0.5	organizied and created PDF format of documents recd from client
10/3/2013	KW	0.4	scan and update electronic documents file of deponent [ ] .4
10/3/2013	KW	1.3	review defendant produced documents to identify possible exhibits for 30(b)(6) depoition; select and copy to electronic folder .7 review documents from opt-in plaintiffs to identify possible exhibits for 30(b)(6) depoition; select and copy to electronic folder .6
10/3/2013	KW	0.3	download deposition transcript of plaintiff [ ] .1 prepare transcript and Errata sheet to be mailed to deponent for review .2
10/3/2013	KW	0.4	JS/KW organize and transfer files to storage .4
10/3/2013	KW	0.3	Draft explanatory letter .2 prepare mailing of transcript and Errata sheets to deponent [ ] .1
10/3/2013	KW	1.5	reveiw, verify and update contact information for opt-in plaintiffs to provide current accurate information for litigation team- 1.5
10/3/2013	KW	0.3	download deposition transcript of named plaintiff [ ] .1 prepare transcript and Errata sheet to be mailed to deponent for review .2
10/3/2013	DG	0.5	email to def re doc request for 30b6 depo .1; draft 30b6 deposition outline .4
10/4/2013	CLER	0.4	prepare mailing of depositions and ltr to clients for review

Date	Staff	Amount of Time	Description
10/4/2013	DG	2.1	md/dg discussing kellogg's discovery production and 30b6 deposition 0.2; prepare 30b6 deposition outline 1.5; arrange hotel stay as depo location not available .4
10/4/2013	DG	0.2	JS/DG discuss FB ad for Kellogg, implement
10/4/2013	JS	0.2	JS/DG discuss FB ad for Kellogg, implement
10/4/2013	MD	1.5	md reviewing documents for 30b6 deposition 1.5
10/4/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of Stephen Kern)
10/4/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#132 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Stephen Kern)(Dunn, Matt)
10/4/2013	JS	0.5	design and implement FB ad for Kellogg
10/4/2013	JS	0.5	convert pdf to xls; successful convert for ex.8, unsuccessful for ex.7
10/4/2013	MD	0.2	md/dg discussing exhibits to use at 30b6 deposition 0.2
10/4/2013	MD	0.2	md/dg discussing kellogg's discovery production and 30b6 deposition 0.2
10/4/2013	DG	0.2	md/dg discussing exhibits to use at 30b6 deposition 0.2
10/4/2013	DG	1	review exhibits for use at 30b6 depo 1
10/4/2013	CLER	0.2	prepare welcome ltr to new client
10/4/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/4/2013	CLER	0.1	Data Entry of contact information of new client
10/7/2013	KW	0.3	review reimbursement requests of plaintiff [ ] for deposition expenses .1 submit claim for reimbursement .1 reposnd to email from plaintiff [ ] .1
10/7/2013	DG	4.5	prepare for deposition - reading def exhibits to coll action 2.5; outline questions 2
10/7/2013	DG	0.1	md/dg discussing defense counsel opposition to conditional certification 0.1
10/7/2013	KW	0.1	update contact information for new opt-in [ ] .1
10/7/2013	CLER	0.4	prepare mailing to clients (depo transcripts for review)
10/7/2013	MD	0.2	md reading kellogg's response to motion to amend complaint 0.2
10/7/2013	DG	0	md/dg discussing defense counsel opposition to conditional certification 0.1
10/7/2013	CLER	0.6	Transfer documents recd from ECF system to docket file and create hard copies for attorneys (Docket#133 - MOTION to Certify Class OPPOSITION by Defendants Kellogg Company, Kellogg Sales Company, Kellogg USA Inc. Oral Argument Requested. (Attachments: # (1) Exhibit Patty Thomas Deposition Transcript, # (2) Exhibit Jennifer Dowling Deposition Transcript, # (3) Exhibit Kelley Dye Deposition Transcript, # (4) Exhibit Robert Gibson Deposition Transcript, # (5) Exhibit Brussell Declaration and Attachments, # (6) Exhibit Declarations In Support Of, # (7) Exhibit Soliman Sayedi Deposition Transcript, # (8) Exhibit KUSA Sales Job Profile, # (9) Exhibit Jeff Williams Declaration)
10/7/2013	CLER	0.1	Noting Date 9/6/2013, (Nelson, James)
10/7/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#134 - REQUEST For Oral Argument by Defendants Kellogg Company, Kellogg Sales Company for Oral Argument re [133] MOTION to Certify Class OPPOSITION. (Nelson, James)
10/7/2013	CLER	0.4	download depostion transcript update electronic file of transcripts and exhibits prepare mailing of transcript and errata form to plaintiff [ ]
10/7/2013	JS	0.1	email to DG/MS about Kellogg FB ad results
10/7/2013	DG	0.8	DG/MD/KW discuss defendant's opposition to collective action motion and attached declarations to determine information to pursue at 30(b)(6) deposition and to plan plaintiff's reply to collecitive action
10/7/2013	MD	1	md reviewing documents for 30b6 deposition 1.0

Date	Staff	Amount of Time	Description
10/7/2013	KW	0.6	read and take notes on defendant's opposition to collective action motion read and take notes on attached exhibits to prepare for participation in litigation team meeting to plan response and information to pursue at 30(b)(6) deposition
10/7/2013	MD	0.7	md read kellogg's opposition to plaintiffs' motion for conditional certification 0.7
10/7/2013	MD	0.8	D/MD/KW discuss defendant's opposition to collective action motion and attached declarations to determine information to pursue at 30(b)(6) deposition and to plan plaintiff's reply to collective action
10/7/2013	JS	0.1	check FB ad; run report
10/7/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#135 - RESPONSE, by Defendants Kellogg Company, Kellogg Sales Company, to [125] MOTION to Amend [56] Amended Complaint,. (Nelson, James)
10/7/2013	CLER	0.4	download deposition transcript update electronic file of transcripts and exhibits prepare mailing of transcript and errata form to plaintiff [ ]
10/7/2013	DG	0.2	draft statement for FB for putative clients review .1; review [client] facts re severance .1
10/7/2013	AG	0.5	preparing exhibits for deposition
10/7/2013	MR	0.7	prep flash drive and laptop for atty DG deposition trip
10/7/2013	KW	0.8	DG/MD/KW discuss defendant's opposition to collective action motion and attached declarations to determine information to pursue at 30(b)(6) deposition and to plan plaintiff's reply to collective action
10/7/2013	MD	0.1	md/dg discussing defense counsel opposition to conditional certification 0.1
10/7/2013	DG	2.1	review def's declarations on class in preparation for deposition 2; check in for flight .1
10/7/2013	DG	0.1	DG/MR review process to access data from encrypted drive
10/7/2013	CLER	0.4	download deposition transcript update electronic file of transcripts and exhibits prepare mailing of transcript and errata form to plaintiff [ ]
10/7/2013	MR	0.1	DG/MR review process to access data from encrypted drive
10/8/2013	MD	3	md drafting reply to motion amend complaint 3.0
10/8/2013	DG	7.5	travel to MI for 30b6 deposition 11-6:30
10/8/2013	MD	0.4	md review documents for 30b6 deposition 0.4
10/8/2013	KW	0.1	JS/KW discuss FB posting and editorial issues, necessity of keeping lead paras in communication loop
10/8/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#136 - NOTICE OF LODGING DEPOSITION REPORTER CERTIFICATES IN SUPPORT OF re [133] MOTION to Certify Class OPPOSITION ; filed by Defendants Kellogg Company, Kellogg Sales Company. (Nelson, James)
10/8/2013	JS	0.1	JS/KW discuss FB posting and editorial issues, necessity of keeping lead paras in communication loop
10/9/2013	CLER	0.2	Data Entry of contact information of new clients
10/9/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/9/2013	CLER	0.3	prepare welcome ltr to new clients
10/9/2013	KW	0.7	DG/MD/JP/KW conference about 30(b)(6) deposition progress and issues to be explored .7
10/9/2013	JP	0.7	DG/MD/JP/KW conference about 30(b)(6) deposition progress and issues to be explored .7
10/9/2013	MD	0.7	DG/MD/JP/KW conference about 30(b)(6) deposition progress and issues to be explored .7

Date	Staff	Amount of Time	Description
10/9/2013	DG	7.5	DG/MD/JP/KW conference about 30(b)(6) deposition progress and issues to be explored .7 [during depo break] deposition 10-5; travel to deposition .3; travel from deposition .5
10/9/2013	AG	0.2	ECF Filing NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Wendy Lynn Frey, # (2) Consent to Sue of Sharon Ziegler)
10/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#137 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Wendy Lynn Frey, # (2) Consent to Sue of Sharon Ziegler)(Dunn, Matt)
10/9/2013	KW	0.5	fact finding interview with former Territory Manager who wants to join this lawsuit .3 open case contact and add case information .1 email pdf of consent to sue to [ ] at his request .1
10/9/2013	KW	0.2	telephone call from Plaintiff [ ] seeking case update and asking questions about court process
10/9/2013	KW	0.2	open case contact .1 forward consent form for filing .1
10/9/2013	MD	4	md drafting reply brief for motion to amend 4.0
10/9/2013	KW	0.2	draft cover letter and process mailing of reimbursement check to plaintiff [ ] for deposition expenses
10/10/2013	AG	0.2	ECF Filing of NOTICE of Filing of Cosent to Sue (Attachments: # (1) Consent to Sue of Curtis Barker)
10/10/2013	MD	2.3	md review second amended complaint to highlight additional and bracket deletions 2.3
10/10/2013	JP	0.6	discuss possible retalaition issue
10/10/2013	DG	0.5	md/dg discussing testimony from 30b6 deposition and how it relates to collective action motion 0.5
10/10/2013	MD	0.5	md/dg discussing testimony from 30b6 deposition and how it relates to collective action motion 0.5
10/10/2013	JP	0.7	question about possible retalaition base for being fired by Kellogg
10/10/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#138 - NOTICE of Filing of Cosent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Curtis Barker)(Dunn, Matt)
10/10/2013	JP	0.1	email and voice mail about needing a signature that is not electronic on CTS
10/10/2013	JP	0.2	talk to wife about husband's employment with Kellogg
10/10/2013	CLER	0.1	Data Entry of contact information of new client
10/10/2013	JP	1	fact finding intake
10/10/2013	KW	0.8	md/jp/kw- confer about defendant's categories of exempting workers from Overtime pay discuss and determine how to proceed in terms of possible administrative exemption and workers who have off the clock hour claims
10/10/2013	CLER	0.2	prepare welcome ltr to new client
10/10/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/10/2013	JP	0.8	md/jp/kw- confer about defendant's categories of exempting workers from Overtime pay discuss and determine how to proceed in terms of possible administrative exemption and workers who have off the clock hour claims
10/10/2013	MD	0.8	md/jp/kw- confer about defendant's categories of exempting workers from Overtime pay discuss and determine how to proceed in terms of possible administrative exemption and workers who have off the clock hour claims
10/11/2013	MD	0.5	md call with client about conversations he had with managers re job duties and hours worked 0.5

Date	Staff	Amount of Time	Description
10/11/2013	DG	7.5	return travel from deposition 10:30 -5:45 7.3 minus other work [6.9] edit motion to amend .4; call to Boudreau re his claim of ethical violation .1; review of law re same .1, review docs relevant to Boudreau's ethical claims .4 [ during travel]
10/11/2013	JP	2.1	review data on clients for additional state class reps
10/11/2013	MD	0.1	md/jp discussing whether opt-in qualifies to be in case 0.1
10/11/2013	MD	0.1	md respond to jp re named plaintiff for class claim 0.1
10/11/2013	MD	0.4	md/dg discussing edits to reply to motion to amend complaint and ethical allegations by defense counsel 0.4
10/11/2013	MD	1.5	md editing reply to motion to amend the complaint 1.5
10/11/2013	MD	2.5	md researching standards of professional conduct for facebook and social media ads 2.5
10/11/2013	JP	0.1	md/jp discussing whether opt-in qualifies to be in case 0.1
10/11/2013	DG	0.4	md/dg discussing edits to reply to motion to amend complaint and ethical allegations by defense counsel 0.4
10/15/2013	DG	0.4	call to JB re taking down facebook ads .4
10/15/2013	MD	0.4	DG/MD/JS meet to discuss Kellogg FB ad strategy
10/15/2013	DG	0.4	DG/MD/JS meet to discuss Kellogg FB ad strategy
10/15/2013	JS	0.4	DG/MD/JS meet to discuss Kellogg FB ad strategy
10/15/2013	JP	0.5	fact finding intake and discussion about retaliation concerns
10/15/2013	JS	0.2	draft test FB ad to determine criteria to narrow or widen reach to potential opt-ins
10/15/2013	DG	0.1	call to JBoudreau re his charges re advertising .1
10/15/2013	CLER	0.5	create PDF format of documents recd from client
10/15/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#139 - REPLY, filed by Plaintiff Patty Thomas, TO RESPONSE to [125] MOTION to Amend [56] Amended Complaint, (Attachments: # (1) Exhibit Exhibit 2: Second Amended Complaint With Changes Notated)(Dunn, Matt
10/16/2013	CLER	0.2	Transfer documents recd from Email system to docket file and create file copy( FINAL ASCII from the 10-9-2013 deposition of Ms. Bussell. Also attached is a complimentary printable, readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
10/16/2013	CLER	0.4	create PDF format of documents recd from client
10/16/2013	KW	1.7	use Abbey fine reader OCR to transcribe Zone Rosters .6 edit and correct zone roster list to have accurate files 1.1
10/16/2013	KW	0.9	JP/KW Review list of plaintiffs review list of states which would be good for state class claims determine work needed to present opportunity of state class representation to appropriate plaintiffs discuss and plan organization of incoming documents from plaintiffs
10/16/2013	JP	0.9	JP/KW Review list of plaintiffs review list of states which would be good for state class claims determine work needed to present opportunity of state class representation to appropriate plaintiffs discuss and plan organization of incoming documents from plaintiffs
10/16/2013	AG	0.2	PCT TSG regarding 30(b)(6) transcript status
10/17/2013	DG	0.3	md/dg discussing testimony from 30b6 and how it relates to reply brief argument 0.3
10/17/2013	MD	3	md reading and digesting 30b6 deposition transcript 3.0
10/17/2013	KW	0.1	telephone call to plaitniff to schedule appointment to discuss possible state class action in Colorado



Date	Staff	Amount of Time	Description
10/17/2013	MD	0.3	md/dg discussing testimony from 30b6 and how it relates to reply brief argument 0.3
10/17/2013	KW	0.5	initial contact interview .3 open case contact .1 update case notes .1
			upload document production from defendant .2 update electronic file of documents for
10/17/2013	KW	0.3	efficient access by litigation team .1
10/17/2013	KW	0.4	complete preparation of mailing list using Michigan Zone Roster .4
10/17/2013	DG	0.3	draft email to JB re Facebook ads .3
10/17/2013	JS	0.5	proofread letter from MS
10/17/2013	KW	0.4	edit mailing list to send information regarding lawsuit to Michigan Zone Roster .4
10/17/2013	MD	0.1	md review letter to be sent to defense counsel re attorney advertising via facebook 0.1
10/17/2013	JP	0.3	jp/kw work together to prepare finalized mailing list to exclude current plaintiffs
10/17/2013	MD	0.2	md review defendants' objections to plaintiffs discovery demands 0.2
			legal research on 1st Am issue raised by def 1; email to other counsel re popup ads and
10/17/2013	DG	1.4	first am .4
			legal research on ethics of pop up ads in context of a case .8; review def letter and email
10/17/2013	DG	1	re same .2
			Transfer documents recd from ECF system to docket file and create file copy(Docket#140 - NOTICE of Filing of Consent to Sue filed by Plaintiff Patty Thomas. (Attachments: # (1)
10/18/2013	CLER	0.1	Consent to Sue of Paula Wiemer)(Dunn, Matt)
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
10/18/2013	AG	0.2	Paula Wiemer)
10/18/2013	DG	7.2	draft reply brief 7.2
10/18/2013	CLER	0.1	PCF client updating contact information
10/18/2013	MD	0.8	md researching state law claims .8
			create PDF format of correspondence recd from D. (CD containg docs bates numbered
10/18/2013	CLER	0.2	KELLOGG-7662-7702)
10/18/2013	CLER	0.1	Data Entry of contact information of new client
10/18/2013	CLER	0.2	prepare welcome ltr to new client
10/18/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/18/2013	JP	0.1	email response to request for info
			create PDF format of correspondence recd from D. ( D. Responses and Objections to P.
10/18/2013	CLER	0.3	docs request and rogs)
10/21/2013	CLER	0.1	create PDF format of correspondence recd from D. (online solicitation)
10/21/2013	DG	0.1	review ct order on motion to amend .1
			telephone call to plaintiff [ ] -in repsonse to her message to contact her re case
10/21/2013	KW	0.2	developments update case notes
			telephone call from named plaintiff to discuss depostion related expenses and
			reimbursement .2 relay receipts and deposition information to paralegal in charge of
10/21/2013	KW	0.3	reimbursement .1
10/21/2013	DG	0.3	email to JB re first amendment and popup ads .3
10/21/2013	DG	0.2	md/dg discussing arguments made in draft reply brief 0.2
10/21/2013	MD	0.2	md/dg discussing arguments made in draft reply brief 0.2
			respond to email from named plaintiff regarding deposition expenses .1 update
10/21/2013	KW	0.2	electronic file of depostion expenses .1
10/21/2013	MD	4.7	md reviewing and editing reply brief 4.7

Date	Staff	Amount of Time	Description
			read discovery correspondence- .1 read defendant's responses to discovery requests .3
10/22/2013	CLER	0.6	add to electronic file of discovery documents .1 organize and update electronic file .1
10/22/2013	DG	3.3	review and edit coll ac reply 3.3
10/22/2013	MD	0.2	md/dg discussing arguments to raise in reply brief 0.2
10/22/2013	DG	0.2	md/dg discussing arguments to raise in reply brief 0.2
10/22/2013	MD	0.2	md review and finalize 2d amended complaint for filing 0.2
10/22/2013	MD	0.3	md review and prepare amended complaint for filing 0.3
10/22/2013	MD	1.5	md editing reply brief for collective action motion 1.5
10/22/2013	KW	0.1	verify contact information in electronic file for opt-in [ ]
10/22/2013	KW	0.1	verify contact information in electronic file for opt-in [ ]
10/22/2013	KW	0.1	verify contact information in electronic file for opt-in [ ]
10/22/2013	KW	0.1	verify contact information in electronic file for opt-in [ ]
10/22/2013	JS	1	filing second amended complaint with Wash. west Dist. Tacoma
			compose Table of Authorities for PLT rep memo in sup of mot for cond collective action
10/23/2013	JS	1.6	certification
10/23/2013	MD	0.7	md reviewing and handwriting edits to reply brief 0.7
10/23/2013	DG	2.1	draft reply to collective 2; review def's letter re meet and confer on interrog answers .1
			verify contact information for plaintiff . email response to plaintiff's questions regarding
10/23/2013	KW	0.2	case information
			Transfer documents recd from ECF system to docket file and create file copy(Docket#141 - ORDER granting [125] Motion to Amend. Counsel is directed to e-file their Amended
10/23/2013	CLER	0.1	Complaint. Signed by Judge Ronald B. Leighton.(DN)
			ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of
10/23/2013	AG	0.2	Joseph Reed, # (2) Consent to Sue of Michael White)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#143 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
10/23/2013	CLER	0.1	Consent to Sue of Joseph Reed, # (2) Consent to Sue of Michael White)(Dunn, Matt)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#142 - Second AMENDED COMPLAINT Class Action and FLSA Collective Action against defendant(s) Kellogg Company, Kellogg Sales Company, filed by Robert Gibson, Kelley Dye, Jr, Patty Thomas, Jennifer Dowling, Laura Wisby, David Rink. (Attachments: # (1)
10/23/2013	CLER	0.1	Certificate of Service)(Dunn, Matt)
10/23/2013	KW	1.1	initial intake interview .8 open case contacts .1 update case information .2
10/23/2013	MD	0.5	md review reply and make edits 0.5
10/23/2013	CLER	0.3	prepare welcome ltr to new clients
10/23/2013	CLER	0.2	Data Entry of contact information of new clients
10/23/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/23/2013	MD	1.5	md finding cites from 30b6 deposition for reply brief and updating reply brief 1,5
10/24/2013	JP	0.9	fact finding intake
10/24/2013	CLER	0.2	prepare fedex label for client mailing of documents
10/24/2013	JP	0.4	husband of kellogg employee had questions about representation & retaliation
10/24/2013	MD	0.2	md preparing reply brief for filing 0.2
10/24/2013	MD	0.2	md preparing exhibits for filing 0.2
10/24/2013	JP	0.3	client called to discuss ways to involve other employees in case

Date	Staff	Amount of Time	Description
10/24/2013	JP	0.7	discussion plaintiff being a state class representative
10/24/2013	JP	0.5	fact finding intake
10/24/2013	MD	1.5	md editing collective action reply memo 1.5
10/24/2013	DG	0.1	md/dg discussing arguments for reply brief 0.1
10/24/2013	MD	0.1	md/dg discussing arguments for reply brief 0.1
10/24/2013	JS	0.1	create Exhibit 9 for MD
10/24/2013	DG	1.5	edit reply brief 1.5
10/24/2013	DG	0.3	md/dg discussing final edits to reply brief for collective action motion 0.3
10/24/2013	MD	0.3	md/dg discussing final edits to reply brief for collective action motion 0.3
10/25/2013	MD	0.2	md drafting letter re discovery responses 0.2
10/25/2013	JS	1	proofread and edit [5.5.15.6 Draft Reply JS ToA.docx]
10/25/2013	MD	3.5	md preparing reply brief and exhibit for filing including making final edits 3.5
10/25/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#145 - DECLARATION of Matt Dunn filed by Plaintiff Patty Thomas re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Attachments: # (1) Exhibit 8 - 30b6 Deposition, # (2) Exhibit 9 - Variable Labor Report, # (3) Certificate of Service)(Getman, Dan)
10/25/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#144 - REPLY, filed by Plaintiff Patty Thomas, TO RESPONSE to [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Getman, Dan)
10/25/2013	JS	0.2	js/md meet to discuss preferences re: drafting memos
10/25/2013	MD	0.2	js/md meet to discuss preferences re: drafting memos
10/25/2013	AG	0.1	ECF Filing of REPLY TO RESPONSE to [81] MOTION to Certify a FLSA Collective Action and Issue Notice
10/25/2013	AG	0.2	ECF Filing of DECLARATION of Matt Dunn re [81] MOTION to Certify a FLSA Collective Action and Issue Notice (Attachments: # (1) Exhibit 8 - 30b6 Deposition, # (2) Exhibit 9 - Variable Labor Report, # (3) Certificate of Service)
10/28/2013	CM	0.1	call from client re when to do intake call (.1)
10/28/2013	JP	0.5	fact finding intake
10/28/2013	MD	3.5	md drafting letter re interrogatory responses, and conducting research 3.5
10/28/2013	CLER	0.1	create PDF format of correspondence from D. (D. Rogs issues)
10/29/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/29/2013	CLER	0.2	prepare welcome ltr to new client
10/29/2013	CLER	0.1	Data Entry of contact information of new client
10/29/2013	DG	0.6	review filings, .3; make travel arrangements .3
10/29/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Sunshine Walling)
10/29/2013	MD	0.5	md research additional case law and local rules to support response re interrogatories 0.5
10/29/2013	MD	1.5	md edit letter to defense counsel about interrogatory responses 1.5
10/29/2013	KW	0.2	Verify consent to sue and contact information .1 email to plaintiff [ ] to schedule appointment for intake interview .1
10/29/2013	KW	0.1	verify consent to sue and contact information .1
10/29/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#146 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Sunshine Walling)(Dunn, Matt)
10/29/2013	KW	0.1	verify consent to sue and contact information .1
10/31/2013	CLER	0.7	review and organize documents sent by plaintiff [ ] .5 update electronic files of client documents .2
11/1/2013	CM	2	prepare mail merge of letters to potential opt-ins (2)

Date	Staff	Amount of Time	Description
11/1/2013	CM	0.2	JP/CM discuss mailing to potential opt-ins (.2)
11/1/2013	JP	0.2	JP/CM discuss mailing to potential opt-ins (.2)
11/1/2013	AG	0.9	prepare mining mailing
11/4/2013	KW	0.2	jp/kw discussion of information related to putative class member and updating electronic files .2
11/4/2013	KW	0.4	discussion with putative class member who is a current employee and concerned about retaliation if she opts-in .3 update case notes .1
11/4/2013	CM	0.1	report to team re mailings (.1)
11/4/2013	CM	1.5	prepare mailing for potential opt-ins (1.5)
11/4/2013	JP	0.2	jp/kw discussion of information related to putative class member and updating electronic files .2
11/5/2013	KW	0.4	jp/kw review calendars 2010-2013 of days and hours worked of plaintiff [ ] to assess accurate overtime hours worked of Territory Managers discuss work needed to make an accurate record of daily time worked discuss work needed to make data usable to determine overtime worked
11/5/2013	DG	0.1	dg/lp/kw review work hours calendars 2010-2013 kept by plaintiff [ ] .1
11/5/2013	JP	0.1	dg/lp/kw review work hours calendars 2010-2013 kept by plaintiff [ ] .1
11/5/2013	KW	0.1	md/jp/kw review work hours calendars 2010-2013 kept by plaintiff [ ] .1
11/5/2013	MD	0.1	md/jp/kw review work hours calendars 2010-2013 kept by plaintiff [ ] .1
11/5/2013	JP	0.1	md/jp/kw review work hours calendars 2010-2013 kept by plaintiff [ ] .1
11/5/2013	KW	0.1	dg/lp/kw review work hours calendars 2010-2013 kept by plaintiff [ ] .1
11/5/2013	JP	0.4	jp/kw review calendars 2010-2013 of days and hours worked of plaintiff [ ] to assess accurate overtime hours worked of Territory Managers discuss work needed to make an accurate record of daily time worked discuss work needed to make data usable to determine overtime worked
11/6/2013	KW	0.1	telephone call to work out problems with faxing consent to sue
11/6/2013	KW	0.2	respond to email from plaintiff [ ] regarding case progress update case contact information
11/6/2013	KW	0.4	fact finding interview with putative class member .3 open case contact .1
11/6/2013	CLER	0.1	Data Entry of contact information of new client
11/6/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/6/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#147 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jessica Quigley)(Dunn, Matt)
11/6/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue . (Attachments: # (1) Consent to Sue of Jessica Quigley
11/6/2013	CLER	0.2	prepare welcome ltr to new client
11/6/2013	DG	0.4	review Kehe decision on OSE in OH .4
11/6/2013	KW	0.7	intake interview with putative class member .6 add information to case notes .1
11/7/2013	KW	0.7	read and take notes on KeHe decision regarding outside sales exemption and "Primary duty" as it relates to claims in this lawsuit .7
11/12/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#149 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kathryn E. McFarland, # (2) Consent to Sue of Mary Jo Oesterling)(Dunn, Matt)
11/12/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of Kathryn E. McFarland, # (2) Consent to Sue of Mary Jo Oesterling)
11/12/2013	CLER	0.1	Data Entry of contact information of new client
11/12/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing

Date	Staff	Amount of Time	Description
11/12/2013	CLER	0.2	prepare welcome ltr to new client
11/12/2013	KW	0.8	intake interview .5 open case contact .1 record information in case notes .2 initial intake interview .4 open case contact .1 email consent form to putative class member .1
11/12/2013	KW	0.6	telephone call to follow-up on enquiry for case information .1 add additional contact information to case notes.1
11/12/2013	KW	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#148 - ANSWER to [142] Amended Complaint, with JURY DEMAND by Kellogg Company.(Boudreau, James)
11/12/2013	CLER	0.1	Data Entry of contact information of new client
11/12/2013	CLER	0.2	prepare welcome ltr to new client
11/12/2013	CLER	0.2	telephone call from putative class member enquiring about case development and how to join .3 open case contacts .1
11/13/2013	KW	0.4	conduct address verification of RTS mailing (mining ltrs)
11/13/2013	AG	0.5	prepare ltr to intake with CTS
11/13/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/14/2013	AG	0.2	Data Entry of contact information of new client
11/14/2013	CLER	0.1	prepare welcome ltr to new client
11/14/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#150 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Cynthia Meuth)(Dunn, Matt)
11/14/2013	CLER	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Cynthia Meuth)
11/14/2013	AG	0.2	conduct address verification of RTS mailing (mining ltrs)
11/15/2013	AG	0.5	md/jp discussing opt-in that signed happy camper declaration and facts that opt-in provided to Kellogg 0.1
11/15/2013	JP	0.1	md/jp discussing opt-in that signed happy camper declaration and facts that opt-in provided to Kellogg 0.1
11/15/2013	MD	0.1	fact finding intake .5; email consent to sue and copy of his declaration submitted by Kellogg to support opposition to collective action motion .2
11/15/2013	JP	0.7	fact finding intake discussion and explanation of the lawsuit, .4; email cts .1
11/15/2013	JP	0.5	fact finding intake discussion and explanation of the lawsuit, .4; email cts .1
11/18/2013	JS	0.1	eml with cts and website link
11/18/2013	JS	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#151 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of David Aldrich, # (2) Consent to Sue of Tony Cain)(Dunn, Matt)
11/19/2013	CLER	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of David Aldrich, # (2) Consent to Sue of Tony Cain)
11/19/2013	AG	0.2	respond to emailed question about the deadline for joining.
11/19/2013	JP	0.1	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/19/2013	AG	0.3	prepare welcome ltr to new clients
11/19/2013	CLER	0.3	initial intake interview with putative class member .3 open case contact .1
11/19/2013	KW	0.4	Data Entry of contact information of new clients
11/19/2013	CLER	0.2	message left for potential plaintiff in request for contact
11/19/2013	JP	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket# 152 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Aaron Noble, # (2) Consent to Sue of Cynthia Rubino)(Dunn, Matt)
11/20/2013	CLER	0.1	read correspondence from defendant re Interrogatory responses .1 file correspondence-
11/20/2013	KW	0.2	update electronic case file .1

Date	Staff	Amount of Time	Description
11/20/2013	MD	0.2	read letter from defendant re response re discovery issues 0.2
11/20/2013	JP	0.5	fact finding intake and discussion of being a state class rep.
11/20/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Aaron Noble, # (2) Consent to Sue of Cynthia Rubino)
11/20/2013	CLER	0.2	prepare welcome ltr to new client
11/20/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/20/2013	CLER	0.1	Data Entry of contact information of new clients
11/20/2013	CLER	0.1	Data Entry of contact information of new client
11/20/2013	CLER	0.2	prepare welcome ltr to new client
11/21/2013	KW	0.3	jp/kw discussion to determine what is required of a state class action representative; how demands on class representatives seem to be increasing; identify questions to ask out litigation team regarding this issue
11/21/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Troy R. Hawkins, # (2) Consent to Sue of David Mastenbrook)
11/21/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#153 NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Troy R. Hawkins, # (2) Consent to Sue of David Mastenbrook)(Dunn, Matt)
11/21/2013	JP	0.3	jp/kw discussion to determine what is required of a state class action representative; how demands on class representatives seem to be increasing; identify questions to ask out litigation team regarding this issue
11/21/2013	CLER	0.1	Data Entry of contact information of new client
11/21/2013	CLER	0.2	prepare welcome ltr to new client
11/21/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/21/2013	JP	0.2	jp/kw discuss how to answer plaintiffs and putative class members questions and concerns about possible retaliation if they opt-in to this lawsuit
11/21/2013	KW	0.2	jp/kw discuss how to answer plaintiffs and putative class members questions and concerns about possible retaliation if they opt-in to this lawsuit
11/22/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/22/2013	CLER	0.1	Data Entry of contact information of new client
11/22/2013	CLER	0.2	prepare welcome ltr to new client
11/22/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#154 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jeffrey Manier)(Dunn, Matt)
11/22/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue. (Attachments: # (1) Consent to Sue of Jeffrey Manier)
11/25/2013	KW	0.3	Prepare updated client list for efficient access to linformation by litigation team .1 telephone call to plaintiff [ ] to verify and update contact information .1 add information to electronic file .1
11/25/2013	JP	0.5	fact finding intake and answered questions about lawsuit
11/25/2013	JP	0.3	fact finding intake
11/26/2013	JP	0.6	fact finding intake
11/26/2013	MA	0.1	call from putative class member to discuss joining
11/27/2013	DG	0.4	legal research on Court's responses to def objection to facebook advertising by plaintiffs'
11/27/2013	JP	0.5	counsel .4
11/27/2013	KW	0.9	fact finding intake
11/27/2013	CLER	0.1	Initial Intake interview .7 organize information .1 open case contact and enter information .1
11/27/2013	CLER	0.2	Data Entry of contact information of new client
11/27/2013	CLER	0.2	prepare welcome ltr to new clients



Date	Staff	Amount of Time	Description
11/27/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/27/2013	CLER	0.2	prepare welcome ltr to new clients
11/27/2013	CLER	0.1	Data Entry of contact information of new client
11/27/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Donald M. Smith, # (2) Consent to Sue of Bruce L. Jones)
11/27/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#155 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Donald M. Smith, # (2) Consent to Sue of Bruce L. Jones)(Dunn, Matt)
12/2/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/2/2013	CLER	0.2	prepare welcome ltr to new clients
12/2/2013	CLER	0.1	Data Entry of contact information of new client
12/2/2013	CLER	0.2	prepare welcome ltr to new client
12/2/2013	CLER	0.2	Data Entry of contact information of new client
12/2/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Jesse B. Keesee, # (2) Consent to Sue of Charles Latta III)
12/2/2013	KW	0.2	telephone call to schedule initial intake interview .1 email to follow-up on filing consent to sue .1
12/2/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#156 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jesse B. Keesee, # (2) Consent to Sue of Charles Latta III)(Dunn, Matt)
12/2/2013	JP	0.6	fact finding intake
12/2/2013	JP	0.2	jp/kw discuss case information and proof issues management to facilitate litigation
12/2/2013	JP	0.2	process and keep track of information produced by plaintiffs .2
12/3/2013	KW	0.3	fact finding interview .3
12/3/2013	KW	0.2	fact finding discussion with new plaintiff [ ] .2
12/3/2013	KW	0.6	initial intake information call from putative class member .3 open case contact .1 record case information .1 process mailing of consent to sue to putative class member at his request .1
12/3/2013	JP	0.1	email response to info about off the clock work
12/3/2013	DG	0.1	respond to client re status of case .1
12/3/2013	JP	0.2	email info about lawsuit and discussion of retaliation concerns
12/3/2013	JP	0.2	em information about referral for possible age discrimination lawsuit
12/4/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Pamela A. Pierce)
12/4/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#157 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Pamela A. Pierce)(Dunn, Matt)
12/4/2013	KW	0.1	open case contact .1
12/4/2013	KW	0.1	respond to email from plaintiff [ ] requesting a case update
12/4/2013	JP	0.3	called for update and new referral
12/4/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/4/2013	CLER	0.1	Data Entry of contact information of new client
12/4/2013	CLER	0.2	prepare welcome ltr to new client
12/5/2013	KW	0.3	organize files of plainitffs' deposition transcripts and exhibits .3
12/5/2013	KW	0.4	check electronic files of discovery produced by defendant against CD's of material received to verify completeness and index .4

Date	Staff	Amount of Time	Description
12/5/2013	KW	0.4	scan exhibits used in deposition of Linda Bussell-Kellogg Exec. .2 update electronic deposition transcript and exhibit files to facilitate access to information by litigation team
12/9/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#158 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael D. McEwen, # (2) Consent to Sue of Laveshia Yarborough-Wall)(Dunn, Matt)
12/9/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Michael D. McEwen, # (2) Consent to Sue of Laveshia Yarborough-Wall)
12/9/2013	CLER	0.2	prepare welcome ltr to new client
12/9/2013	CLER	0.1	Data Entry of contact information of new client
12/9/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/9/2013	MD	0.2	md/ms discussing recent 11th cir decision re outside sales exemption 0.2
12/9/2013	CLER	0.2	prepare welcome ltr to new client
12/9/2013	MS	0.2	md/ms discussing recent 11th cir decision re outside sales exemption 0.2
12/9/2013	CLER	0.1	Data Entry of contact information of new client
12/10/2013	CLER	0.2	prepare welcome ltr to new client
12/10/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/10/2013	KW	0.1	telephone call to schedule initial intake interview
12/10/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Paul T. Smart, # (2) Consent to Sue of John Lowenthal)
12/10/2013	KW	0.2	review consent to sue. verify contact information in electronic files .1 review case notes; determine information to be gathered in fact finding interview of new plaintiff
12/10/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#159 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Paul T. Smart, # (2) Consent to Sue of John Lowenthal)(Dunn, Matt)
12/10/2013	KW	0.1	telephone call to schedule intake interview
12/10/2013	KW	0.2	review consent to sue. verify contact information in electronic files .1 review case notes; determine information to be gathered in fact finding interview of new plaintiff
12/10/2013	KW	0.2	update spreadsheet of client list and contact information-update as needed
12/10/2013	CLER	0.2	prepare welcome ltr to new client
12/10/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/10/2013	CLER	0.1	Data Entry of contact information of new client
12/10/2013	MD	2.0	md drafting response to defense counsel letter re interrogatory responses 2.0
12/11/2013	MA	0.1	saving copies of receipts from Facebook ads into fees/costs folder
12/11/2013	JP	0.1	email conformation and response to sent state class retainer
12/11/2013	JP	0.7	fact finding intake
12/11/2013	DG	0.1	edit letter to defs re discovery .1
12/12/2013	JP	0.1	voice message request re calling office about being a state class rep
12/12/2013	KW	0.2	jp/kw discuss status of class representatives determine what is needed from latest representative [ ]
12/12/2013	CLER	0.2	prepare welcome ltr to new client
12/12/2013	JP	0.6	review status of state class rep search and determine new potential reps
12/12/2013	KW	0.4	review file of plaintiff D. Mastenbrook state class representative for MI to determine documents he needs to provide .2 email to plaintiff D. Mastenbrook re preserving emails and sending documents .2

Date	Staff	Amount of Time	Description
12/12/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Alphonso Clark, # (2) Consent to Sue of Kevin Simcox)
12/12/2013	CLER	0.1	Data Entry of contact information of new client
12/12/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/12/2013	JP	0.2	jp/kw discuss status of class representatives determine what is needed from latest representative D. mastnrbrook
12/12/2013	CLER	0.2	prepare welcome ltr to new client
12/12/2013	CLER	0.1	Data Entry of contact information of new client
12/12/2013	KW	0.1	update electronic file of state class representatives .1
12/13/2013	JP	0.1	em requesting state zone roster
12/13/2013	JP	0.1	MD/JP discuss timeline for ruling on collective action and next steps to get additional state claims
12/13/2013	MD	0.1	MD/JP discuss timeline for ruling on collective action and next steps to get additional state claims
12/13/2013	JS	0.5	research possible fb ad for GA and IL, create mock-up, determine possible reach, etc.
12/13/2013	JP	0.1	em request for zone roster
12/13/2013	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#160 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Alphonso Clark, # (2) Consent to Sue of Kevin Simcox)(Dunn, Matt)
12/13/2013	JP	0.1	em requesting zone roster
12/13/2013	JP	0.1	email requesting info re numerosity in state of KY
12/13/2013	JP	0.1	email re requesting zone roster for state of IL
12/13/2013	JP	0.1	email requesting info re numerosity in state of KY
12/13/2013	JP	0.5	review case files for possible state class rep.
12/16/2013	JP	0.8	called to plaintiff to ask if she would be a state class rep, explained requirements .6; create and send state class retainer .2
12/16/2013	JP	0.9	called to plaintiff to ask if she would be a state class rep, explained requirements .7; create and send state class retainer .2
12/19/2013	KW	0.2	respond to plaintiff [ ]'s email to verify filing Consent to Sue .1 update contact information in electronic file .1
12/20/2013	DG	0.5	md/dg call with defense counsel about interrogatories 0.5
12/20/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#161 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Steve Eckholt, # (2) Consent to Sue of Mark Waggoner)(Dunn, Matt)
12/20/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Steve Eckholt, # (2) Consent to Sue of Mark Waggoner)
12/20/2013	CLER	0.2	prepare welcome ltr to new client
12/20/2013	CLER	0.2	prepare welcome ltr to new client
12/20/2013	CLER	0.1	Data Entry of contact information of new client
12/20/2013	MD	0.2	md/dg discussing strategy for response to kellogg's request for interrogatories 0.2
12/20/2013	DG	0.7	md/dg discussing strategy for response to kellogg's request for interrogatories 0.2; edit response email re same .4; edit followup email re same .1
12/20/2013	MD	0.5	md/dg call with defense counsel about interrogatories 0.5
12/20/2013	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/20/2013	CLER	0.1	Data Entry of contact information of new client
12/23/2013	DG	0.3	dg/md discuss whether to respond to Def's interrogatories and how/when .3

Date	Staff	Amount of Time	Description
12/23/2013	DG	0.2	edit response email to defs re discovery .2
12/23/2013	CLER	0.2	prepare welcome ltr to new client
12/23/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/23/2013	CLER	0.1	Data Entry of contact information of new client
12/23/2013	MD	0.3	dg/md discuss whether to respond to Def's interrogatories and how/when .3
12/23/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Richard Quezada)
12/24/2013	DG	0.9	edit first interrogatories .3; edit first request to produce .6
12/24/2013	KW	0.5	research files of Kelloogg organization chart and information which defendant claims they produced
12/24/2013	MD	1.5	md reviewing and drafting discovery demands1.5
12/24/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#162 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Richard Quezada)(Dunn, Matt)
12/26/2013	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/26/2013	CLER	0.1	Data Entry of contact information of new client
12/26/2013	CLER	0.1	create PDF format of correspondence recd from MN Unemployment Ins.
12/26/2013	KW	0.2	review Defendant's Interrogatories to plaintifffs: [ ], [ ], [ ] and [ ] to prepare for communications and interviews with plaintiffs to respond to interrogatories
12/26/2013	CLER	0.2	prepare welcome ltr to new client
12/26/2013	KW	0.3	initial intake information interview .3
12/26/2013	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Wenceslado Castellano Jr.)
12/26/2013	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#163 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Wenceslado Castellano Jr.)(Dunn, Matt)
12/31/2013	KW	1.1	read and take notes from deposition transcript to inform response to defendant's interrogatories .8 add information to draft interrogatory response .2 email completed draft to litigation team for review .1
12/31/2013	KW	0.8	read and take notes from deposition transcript to inform response to defendant's interrogatories .8
12/31/2013	KW	0.2	dg/jp/kw review interrogatory responses to determine which questions require individual responses .2
12/31/2013	KW	0.9	read and take notes from deposition transcript to inform response to defendant's interrogatories .7 add information to plaintiff's response to defendant's interrogatories .2
12/31/2013	KW	0.4	review response to interrogatories .3 add information to complete responses .1
12/31/2013	JP	0.2	dg/jp/kw review interrogatory responses to determine which questions require individual responses .2
12/31/2013	DG	0.2	dg/jp/kw review interrogatory responses to determine which questions require individual responses .2
1/3/2014	MA	0.1	call from client [ ] re: case updates
1/3/2014	MD	0.2	md reading defense counsel motion to compel 0.2
1/3/2014	MD	0.2	md/dg discussing response to Kellogg's motion to compel 0.2
1/3/2014	MD	3	md drafting outline for response 3.0
1/3/2014	DG	0.8	md/dg discussing response to Kellogg's motion to compel 0.2; review defs' motion to compel .5; call to J Leighton's deputy clerk re status of collective action motion per Local Civ. R 7(b)(5) .1

Date	Staff	Amount of Time	Description
1/6/2014	KW	0.2	telephone call from plaintiff [ ] to discuss timeframe of case progress .1 update case notes .1
1/6/2014	KW	0.4	md/kw review of interrogatory responses of plaintiff and state class representative [ ] .2 review of deposition testimony to determine if assure accuracy of responses .2
1/6/2014	MD	0.3	md/kw discuss deposition testimony .1 discuss plaintiffs' responses to defendant's intrerrogatories to determine if information is complete and work needed to be completed this week .2.
1/6/2014	KW	0.2	draft email providing case updt information in response to plaintiff's request .2
1/6/2014	KW	0.3	finalize Interrogatory repsonses of plaintiff [ ] for attorney review .3
1/6/2014	KW	0.3	review and update interrogatory responses of [ ] for completeness and accuracy in preparation for attorney reveiw
1/6/2014	CM	0.2	assist KW in finding information re client documents produced (.2)
1/6/2014	DG	0.2	md/dg discussing edits to interrogatory responses 0.2
1/6/2014	KW	0.8	research documents produced by defendnat to gather complete employment file information on plaintiff [ ] to verify interrogatory responses .4 research deposition testimony and declaration testimony to verify accuracy of responses .4
1/6/2014	DG	0.1	call from J Leighton's chambers re status of collective action motion .1
1/6/2014	KW	0.3	use Time Matters to run a complete list of all plaintiffs and their contact information-for efficeient access to information by litigation team .2 email information to litigation team .1
1/6/2014	MD	0.4	md/kw review of interrogatory responses of plaintiff and state class representative [ ] .2 review of deposition testimony to determine if assure accuracy of responses .2
1/6/2014	KW	0.3	md/kw discuss deposition testimony .1 discuss plaintiffs' responses to defendant's intrerrogatories to determine if information is complete and work needed to be completed this week .2.
1/6/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#164 - MOTION to Compel Each Plaintiff's Responses to First Set of Interrogatories by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Declaration of James Nelson, # (2) Proposed Order) Noting Date 1/17/2014, (Nelson, James)
1/6/2014	MD	0.2	md/dg discussing edits to interrogatory responses 0.2
1/7/2014	AG	0.3	preparing document for filing
1/7/2014	MD	2.5	md drafting outline in response to motion to compel 2.5
1/7/2014	KW	1.1	review deposition transcript, collective action declaration and previous interrogatory responses to draft current interrogatory response .6 draft current interrogatgory response incorporating testimony of plaintiff provided at deposition and in declaration docket 84 .5
1/7/2014	KW	0.6	md/kw confer regarding interrogatory objections, responses and information needed to complete responses .6
1/7/2014	KW	0.2	organize electronic document production in prepartaion for finalizing interrrogatory responses .2
1/7/2014	KW	1.1	research deposition transcript, decalration and case notes to inform interrogatories .5 draft interrogatory responses for attorney reveiw .6
1/7/2014	MD	0.5	md review/edit interrogatory responses 0.5

Date	Staff	Amount of Time	Description
			discussion of interrogatory responses with plaintiff [ ] .3 email draft interrogatory response, Docket #144, selected 30(b)(6) deposition transcript pages and Collective Action
1/7/2014	KW	0.6	Declaration to plaintiff for review .3
1/7/2014	JS	0.5	determine materials that were produced sept. 2013
1/7/2014	JS	0.2	js/kw confer reagarding updating electronic file of documents produced to defendant .2
1/7/2014	KW	0.2	finalize interrogatory response of named palintiff [ ]- .2
1/7/2014	DG	0.1	md/dg discussing edits to outline for motion to compel 0.1
1/7/2014	MD	0.1	md/dg discussing edits to outline for motion to compel 0.1
1/7/2014	MD	0.3	md/kw review objections to interrogatories filed with defendant .1 determine next steps in producing responses to interrogatories .2
1/7/2014	KW	0.2	js/kw confer regarding updating electronic file of documents produced to defendant .2
1/7/2014	KW	0.3	md/kw review objections to interrogatories filed with defendant .1 determine next steps in producing responses to interrogatories .2
1/7/2014	MD	0.6	md/kw confer regarding interrogatory objections, responses and information needed to complete responses .6
1/7/2014	DG	0.4	review outline for opposition to motion .4
1/8/2014	KW	0.3	respond to information request form putative class member .2 open new case contact in electronic files .1
1/8/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#165 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Ronald Johnson)(Dunn, Matt)
1/8/2014	KW	0.2	md/kw review draft of interrogatory responses of named plaintiff [ ] ; discuss additions and clarifications needed .2
1/8/2014	KW	0.2	respond to email from named plaintiff [ ] regarding her interrogatory responses .2
1/8/2014	KW	0.3	draft email to explain documents for named plaintiff [ ] to review, need for interrogatories and timeframe for response to defendant .3 email draft of interrogatories, Docket 144 and declaration and sections of deposition transcript of Linda Bussel to plaintiff for review and response
1/8/2014	MD	4	md outlining response to motion to compel 4.0
1/8/2014	KW	0.1	respond to email from named plaintiff [ ] regarding her interrogatory responses .1
1/8/2014	KW	0.3	respond to email from named plaintiff [ ] regarding her interrogatory responses .1 telephone call to verify receipt of responses .1 scan and update electronic file of signed interrogatory responses for production to defendant .1
1/8/2014	KW	0.2	discussion of interrogatory responses with named plaintiff [ ] .2
1/8/2014	CLER	0.1	Data Entry of contact information of new client
1/8/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
1/8/2014	CLER	0.2	prepare welcome ltr to new client
1/8/2014	KW	0.1	telephone call from putative class member requesting information about how to execute consent to sue .1
1/8/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Ronald Johnson)
1/8/2014	KW	0.9	research deposition transcript, declaration and client produced documents to draft interrogatory responses .9



Date	Staff	Amount of Time	Description
1/8/2014	KW	0.3	draft email to explain documents for named plaintiff [ ] to review, need for interrogatories and timeframe for response to defendant .3 email draft of interrogatories, Docket 144 and declaration and sections of deposition transcript of Linda Bussel to plaintiff for review and response
1/8/2014	MD	0.2	md/kw review draft of interrogatory responses of named plaintiff Patty Thomas; discuss additions and clarifications needed .2
1/9/2014	KW	0.3	email court order granting conditional collective action to named plaintiff .1 respond to her questions re court order .2
1/9/2014	KW	0.2	read court order granting conditional certification of class action .2
1/9/2014	KW	0.5	scan completed finalized interrogatory responses with attorney signature .3 update electronic file for production to defendnat .2
1/9/2014	KW	0.1	email court order granting conditional collective action to named plaintiff .1
1/9/2014	MR	2.5	assist client with problem in printing out interrogatory
1/9/2014	KW	0.1	email court order granting conditional collective action to named plaintiff .1
1/9/2014	DG	0.2	md/dg discussing edits to outline for motion to compel opposition brief 0.2
1/9/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#166 - ORDER granting [81] Motion to Certify FLSA Collective Action, signed by Judge Ronald B. Leighton.(DN)
1/9/2014	MD	5	md drafting opposition brief to motion to compel 5.0
1/9/2014	JP	0.5	called for update and advise on how to proceed with age discrimination
1/9/2014	MD	0.2	md/dg discussing edits to outline for motion to compel opposition brief 0.2
1/9/2014	MD	0.1	md read decision by Court re collective action motion 0.1
1/9/2014	KW	0.4	discussion with named plaintiff [ ] regarding completing interrogatory responses .2 update case notes .1 email information to attorney .1
1/9/2014	KW	0.2	receive signed interrogatories .1 update electronic file of signed interrogatories .1
1/9/2014	JP	0.2	read Judge's conditional certification order
1/9/2014	MD	0.1	md review and sign interrogatory response objections 0.1
1/9/2014	CLER	0.5	finalize interrogatory response of named plaintiff [ ].3 create pdf and email for review and signature .2
1/9/2014	JP	0.2	email case update and respond to questions about time line of a case.
1/9/2014	MD	0.1	md email defense counsel about motion to compel 0.1
1/10/2014	DG	3.7	post update to website re coll action certification .3; edit response to motion to compel 3.4
1/10/2014	MD	1.5	md editing motion to compel 1.5
1/10/2014	MD	0.2	md/dg discussing response to defense counsel re email and withdrawal of motion to compel, information needed for motion to compel, and preparing for mailing of court authorized notice 0.2
1/10/2014	DG	0.6	edit opposition to motion to compel .6
1/10/2014	MD	0.1	md/ag discussing material needs for collective action motion filing 0.1
1/10/2014	AG	0.1	md/ag discussing material needs for collective action motion filing 0.1
1/10/2014	AG	2.8	prepare envelopes for notice mailing
1/10/2014	DG	0.2	md/dg discussing response to defense counsel re email and withdrawal of motion to compel, information needed for motion to compel, and preparing for mailing of court authorized notice 0.2
1/10/2014	AG	0.2	AG/MD discussion on mailing of notice procedure and time frame
1/10/2014	JP	0.4	call from client stating he was emailing the interrogatory page to KW .2; go to KW computer and download and save document .1; email attorney issue with undated signature page .1
1/10/2014	MD	0.2	AG/MD discussion on mailing of notice procedure and time frame

Date	Staff	Amount of Time	Description
1/10/2014	MA	0.1	updating facebook page to keep class members informed
1/10/2014	MD	0.4	md reviewing and preparing court approved notice for mailing 0.4
1/13/2014	MD	0.1	md/dg discussing eliminating argument about untimeliness 0.1
1/13/2014	DG	3.2	md/dg discussing review process and edits to brief in opposition to motion to compel 0.2; edit Collective action brief 1.5; final edits to last draft of brief 1.5
1/13/2014	JP	0.2	jp/kw discuss staffing to accomplish mailing of Kellogg notice
1/13/2014	MD	0.3	dg/md call with JB re their motion for clarification .3
1/13/2014	DG	0.3	dg/md call with JB re their motion for clarification .3
1/13/2014	AG	0.1	ag/kw discuss and plan timeframe for mailing collective action notice and consent to sue to 3000 class members
1/13/2014	KW	0.2	respond to emai from plaintiff .1 update case contact information .1
1/13/2014	KW	0.1	respond to message from plaintiff [ ] .1
1/13/2014	MD	0.2	md/dg discussing review process and edits to brief in opposition to motion to compel 0.2
1/13/2014	JS	0.2	memorialize fb comment from [client], eml to kw
1/13/2014	KW	0.2	telephone call from wife of plaintiff regarding paperwork and his SOL
1/13/2014	DG	0.1	read def motion for clarification .1
1/13/2014	MD	2	md editing opposition brief regarding motion to compel, and preparing for filing 2.0
1/13/2014	KW	0.1	ag/kw discuss and plan timeframe for mailing collective action notice and consent to sue to 3000 class members
1/13/2014	AG	2.9	prepare envelopes for notice mailing
1/13/2014	MD	2	md preparing brief in opposition to Kellogg motion to compel for filing; drafting declaration; making final edits to brief 2.0
1/13/2014	MD	0.3	md/dg/mr discussing Kellogg's motion for clarification and action Kellogg needs to take to allow Plaintiffs' emailed notice to be sent to class members mr 0.2 (md/dg 0.3)
1/13/2014	KW	0.2	update client contact information in electronic file .1 respond to plaintiff regarding case update .1
1/13/2014	KW	0.3	attach covers to pdfs of exhibits for motion to compel .3
1/13/2014	MD	0.1	md/dg discussing the scope of Kellogg's discovery request for the response to the motion to compel 0.1
1/13/2014	DG	0.3	md/dg/mr discussing Kellogg's motion for clarification and action Kellogg needs to take to allow Plaintiffs' emailed notice to be sent to class members mr 0.2 (md/dg 0.3)
1/13/2014	KW	0.5	update excell spreadsheet of client contact information for each plaintiff .2 send email to all plaintiffs regarding conditional certification of collective action .2 attach court order .1
1/13/2014	DG	0.1	md/dg discussing the scope of Kellogg's discovery request for the response to the motion to compel 0.1
1/13/2014	MR	0.2	md/dg/mr discussing Kellogg's motion for clarification and action Kellogg needs to take to allow Plaintiffs' emailed notice to be sent to class members mr 0.2 (md/dg 0.3)
1/14/2014	KW	0.4	work with temporary staff to complete scanning of daily calendars produced by plaintiffs
1/14/2014	MD	0.1	md read order re conditional certification notice 0.1
1/14/2014	KW	0.1	dg/kw discuss defendant's latest motion for court to reconsider .1
1/14/2014	MD	0.3	md reading Kellogg's motion for reconsideration 0.3
1/14/2014	MD	0.2	md/dg/kw discussing preparing notice for mailing and response to Kellogg's motion for reconsideration 0.2

Date	Staff	Amount of Time	Description
1/14/2014	DG	0.2	md/dg/kw discussing preparing notice for mailing and response to Kellogg's motion for reconsideration 0.2
1/14/2014	KW	0.1	jp/kw discuss rescheduling staff work to accommodate defendant's motion to reconsider and need to postpone production of mailing Notice and Consent .1
1/14/2014	MD	0.6	md researching via local rules and westlaw, and outling arguments against motion for reconsideration 0.6
1/14/2014	JP	0.1	jp/kw discuss rescheduling staff work to accommodate defendant's motion to reconsider and need to postpone production of mailing Notice and Consent .1
1/14/2014	KW	0.2	telephone call to follow-up on intake call .1 add information to case notes .1
1/14/2014	KW	0.2	md/dg/kw discussing preparing notice for mailing and response to Kellogg's motion for reconsideration 0.2
1/14/2014	KW	0.2	download docket # 168.1 update electronic docket .1
1/14/2014	DG	0.3	dg/kw discuss defendant's latest motion for court to reconsider .1; read def brief for clarification and simultaneously outline response .2
1/14/2014	KW	0.2	md/kw discuss and plan rescheduling of preparing and sending notice .1 discuss content of def. motion to reconsider .1
1/14/2014	JS	0.1	tc asking about suit, ref to KW
1/15/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#170 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Diana Adkins, # (2) Consent to Sue of Christine Draska)(Dunn, Matt)
1/15/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Diana Adkins, # (2) Consent to Sue of Christine Draska)
1/15/2014	CLER	0.3	prepare welcome ltr to new clients
1/15/2014	JP	0.1	emailed case information as per request from internet
1/15/2014	CLER	0.2	Data Entry of contact information of clients
1/15/2014	KW	0.2	respond to plaintiff [ ]'s questions re case progress .2
1/15/2014	MD	0.5	md drafting declaration in support of brief opposing Kellogg's motion regarding notice 0.5
1/15/2014	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
1/15/2014	KW	0.2	respond to email from plaintiff regarding delay in sending out collective action notice .2
1/15/2014	DG	0.1	md/dg discussing deadline to respond to kellogg's motion and next steps to prepare opposition brief 0.1
1/15/2014	KW	0.3	respond to questions from plaintiff regarding defendant's demand that Notice be altered .2 update case notes .1
1/15/2014	MD	0.1	md/dg discussing deadline to respond to kellogg's motion and next steps to prepare opposition brief 0.1
1/15/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#168 - MOTION for Reconsideration re [166] Order on Motion to Certify FLSA Collective Action by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. Noting Date 1/13/2014, (Nelson, James)
1/15/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#169 - ORDER granting [168] Defendant's Motion for Reconsideration, signed by Judge Ronald B. Leighton.(DN)
1/15/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#168 - RESPONSE, by Plaintiff Patty Thomas, to [164] MOTION to Compel Each Plaintiff's Responses to First Set of Interrogatories. (Attachments: # (1) Dunn Declaration, # (2) Exhibit 1, # (3) Exhibit 2, # (4) Exhibit 3, # (5) Exhibit 4, # (6) Exhibit 5)(Dunn, Matt)

Date	Staff	Amount of Time	Description
1/16/2014	KW	0.1	jp/kw discuss possible revisions to wording and need to revise timing of mailing of court ordered notice
1/16/2014	JP	0.1	jp/kw discuss reviewing list of plaitniffs to determine if there is a state class in CA
1/16/2014	JP	0.1	jp/kw discuss possible revisions to wording and need to revise timing of mailing of court ordered notice
1/16/2014	KW	0.1	review class list- email name of potential state class for CA
1/16/2014	KW	0.1	jp/kw discuss reviewing list of plaitniffs to determine if there is a state class in CA
1/16/2014	JP	0.1	em'd request for hard copy of signed state class retainer
1/16/2014	JP	0.7	review plaintiffs with recently filed consents to determine if possible state class reps, ;6; email summary to team .1
1/16/2014	DG	3	draft response to def motion for reconsideration on collective notice 3
1/16/2014	KW	0.2	discussion of timing of mailing of notice with putative class member .1 update case notes
1/17/2014	MD	3	md editing response to kellogg's motion for reconsideration 3.0
1/17/2014	DG	0.2	read defendant's reply on motion to compel ..2
1/17/2014	DG	0.1	review legal research on OSE .1
1/17/2014	MD	0.1	md/dg dicussing response and arguments to kellogg's motion for clarification 0.1
1/17/2014	DG	0.1	md/dg dicussing response and arguments to kellogg's motion for clarification 0.1
1/21/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Timothy H. Beatty)
1/21/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#172 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Timothy H. Beatty)(Dunn, Matt)
1/21/2014	MR	0.6	examination of emails from Kellogg domain and web research .5, email to attys regarding same .1
1/21/2014	KW	0.5	initial intake interview .5
1/21/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
1/21/2014	JS	0.2	call about work emails / what information we are looking for
1/21/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#171 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [164] MOTION to Compel Each Plaintiff's Responses to First Set of Interrogatories (Nelson, James)
1/21/2014	DG	0.1	review MD draft declaration .1
1/21/2014	CLER	0.2	prepare welcome ltr to new client
1/21/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#173 - RESPONSE, by Plaintiff Patty Thomas, to [168] MOTION for Reconsideration re [166] Order on Motion to Certify FLSA Collective Action. (Attachments: # (1) Declaration of Matt Dunn, # (2) Exhibit 1, # (3) Exhibit 2, # (4) Exhibit 3, # (5) Exhibit 4, # (6) Exhibit 5)(Getman, Dan)
1/21/2014	AG	0.3	ECF Filing of RESPONSE to [168] MOTION for Reconsideration re [166] Order on Motion to Certify FLSA Collective Action. (Attachments: # (1) Declaration of Matt Dunn, # (2) Exhibit 1, # (3) Exhibit 2, # (4) Exhibit 3, # (5) Exhibit 4, # (6) Exhibit 5)
1/21/2014	CLER	0.1	Data Entry of contact information of client

Date	Staff	Amount of Time	Description
1/21/2014	MD	3	md preparing opposition brief to Kellogg's motion challenging notice for filing, including drafting declaration, reviewing exhibits, checking case citations, making final edits to brief 3.0
1/21/2014	KW	0.7	organized intake notes and add information to case notes .4 email to litigation team .1 draft explanatory email and email consent to sue to putative class member .2
1/21/2014	KW	0.7	proof read plaintiff's opposition to defendant's motion for reconsideration .3 proof read and note corrections to be made in Table of Authorities .4
1/21/2014	DG	1	edit final reply re notice 1
1/22/2014	CLER	0.2	prepare welcome ltr to new client
1/22/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
1/22/2014	CLER	0.1	Data Entry of contact information of client
1/22/2014	KW	0.4	respond to email from plaintiff [ ] about difference in his paystubs and posting of hourly rate by Kellogg .1 scan to pdf attachments of different paystubs detailing hourly rate pay .1 email information and paystub attachments to litigation team for response .1 update case notes .1
1/22/2014	KW	0.1	add documents produced by plaintiff [ ] to electronic file
1/22/2014	KW	0.1	add calendars submitted by plaintiff to client document electronic file .1
1/22/2014	KW	0.1	email to new plaintiff confirming receipt of his completed Consent to Sue
1/22/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#174 NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Armon McWell)(Dunn, Matt)
1/22/2014	KW	0.2	respond to questions regarding case progress -plaintiff [ ] .1 update case notes .1
1/22/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Armon McWell)
1/23/2014	JP	0.4	called to discuss concerns about returning to employment with Kellogg and being part of lawsuit
1/23/2014	JP	0.9	called to discuss plan to confront Kellogg with ways they treat people badly and ways they set up people to fail prior to his retirement
1/24/2014	AG	0.2	md/ag discussing issuance of notice 0.2
1/24/2014	MD	0.2	md/ag discussing issuance of notice 0.2
1/24/2014	AG	2.5	prepare envelopes for notice mailing
1/24/2014	MD	0.1	dg/md discuss next steps re notice .1
1/24/2014	DG	0.2	dg/md discuss next steps re notice .1; review Court's order re notice clarification .1
1/24/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#175 - ORDER Clarifying [168] MOTION for Reconsideration re [166] Order on Motion to Certify FLSA Collective Action filed by Kellogg Company, signed by Judge Ronald B. Leighton. (DN)
1/24/2014	MD	0.1	md review order from judge about collective action notice 0.1
1/24/2014	MD	0.1	md email defense counsel about production of information for collective action notice 0.1
1/27/2014	DG	0.1	dg/md review chgs to notice and postcard .1
1/27/2014	DG	0.3	md/dg discussing response to defense counsel about extension of time to respond to discovery demands 0.3
1/27/2014	MD	0.1	dg/md review chgs to notice and postcard .1
1/27/2014	MD	0.3	md call w/ Jim Nelson and Mariana about edits to notice 0.3
1/27/2014	MD	0.3	md edit notice and post card reminder to be consistent with Court's order 0.3

Date	Staff	Amount of Time	Description
1/27/2014	KW	0.2	respond to email from plaintiff regarding proof of compensation for 40 hour work week .1 update electronic file of correspondence and documents from plaintiff.1
1/27/2014	MD	0.3	md/dg discussing response to defense counsel about extension of time to respond to discovery demands 0.3
1/27/2014	KW	0.2	dg/jp/kw work on final wording of Collective Action Notice to be sent out
1/27/2014	DG	0.4	dg/jp/kw work on final wording of Collective Action Notice to be sent out .2; review def position re notice changes .2
1/27/2014	KW	0.4	jp/kw review Collective Action Notice to review titles included and details of return discuss titles included in the complaint in light of numerous title changes at Kellogg suggest additional titles to be included in notice
1/27/2014	KW	0.2	dg/jp/kw work on final wording of Collective Action Notice to be sent out
1/27/2014	JP	0.4	jp/kw review Collective Action Notice to review titles included and details of return discuss titles included in the complaint in light of numerous title changes at Kellogg suggest additional titles to be included in notice
1/27/2014	MD	0.2	md/kw review changes to Collective Active Notice to be submitted to defendant
1/27/2014	KW	0.2	md/kw review changes to Collective Active Notice to be submitted to defendant
1/28/2014	JP	1.1	discussed being a state class rep and discussed his job duties
1/28/2014	DG	0.1	md/dg discussing response to defense counsel re proposed edits to notice 0.1
1/28/2014	JP	0.1	dg/jp edit class retainer form .1
1/28/2014	KW	0.2	telephone call to anonymous putative class member who is concerned about retaliation add information to case notes
1/28/2014	MD	0.1	md/dg discussing response, if any, to defense counsel regarding edits to notice 0.1
1/28/2014	KW	0.3	jp/kw discussion of documents sent to our office anonymously detailing work demanded by employer kellogg of Territory Managers .2 discussion of most efficient way to preserve and track documents for future reference .1
1/28/2014	DG	0.1	md/dg discussing response, if any, to defense counsel regarding edits to notice 0.1
1/28/2014	KW	0.1	md/kw determine tasks needed to be completed to send out notice: review materials - verify date of receipt of mailing list from defendant
1/28/2014	JP	0.7	fact finding intake .6; email requesting specific documents .1
1/28/2014	DG	0.1	dg/jp edit class retainer form .1
1/28/2014	MD	0.3	dg, md, jp, kw discuss response to defendant's position regarding Retail Sales Managers not being included in Notice-- finalize wording of Notice to be sent out-
1/28/2014	JP	0.3	dg, md, jp, kw discuss response to defendant's position regarding Retail Sales Managers not being included in Notice-- finalize wording of Notice to be sent out-
1/28/2014	DG	0.3	dg, md, jp, kw discuss response to defendant's position regarding Retail Sales Managers not being included in Notice-- finalize wording of Notice to be sent out-
1/28/2014	JP	0.2	prepare and email state class retainer
1/28/2014	MD	0.2	md review and make edits to the notice and the reminder 0.2
1/28/2014	MD	0.1	md review class list 0.1
1/28/2014	KW	0.2	review documents received from anonymous Territory Manager regarding demands of employer Kellogg



Date	Staff	Amount of Time	Description
1/28/2014	MD	0.1	md/kw determine tasks needed to be completed to send out notice: review materials - verify date of receipt of mailing list from defendant
1/28/2014	JP	0.1	set up time to discuss being state class rep
1/28/2014	MD	0.1	md/dg discussing response to defense counsel re proposed edits to notice 0.1
1/28/2014	KW	0.3	dg, md, jp, kw discuss response to defendant's position regarding Retail Sales Managers not being included in Notice-- finalize wording of Notice to be sent out-
1/28/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing Arrangement of mailing materials (printing and reproduction CTS, Notice and collation of
1/28/2014	CLER	2.5	pages)
1/28/2014	CLER	0.2	prepare welcome ltr to new client
1/28/2014	CLER	0.1	Data Entry of contact information of client
1/29/2014	KW	3.5	work on organizing and preparing mailing of notice 3.5
1/29/2014	MR	0.4	read and reply to email from atty DG regarding Def C response about email addresses .3; examine emails supplied to us by client .1
1/29/2014	MD	0.1	md email defense counsel about producing remaining information 0.1
1/29/2014	CLER	4.2	Arrangement of mailing materials (printing and reproduction CTS, Notice and collation of pages)
1/29/2014	JP	4.9	work on organizing and preparing mailing of notice
1/29/2014	KW	2	process mailing of collective action notice to over 2000 potential opt-ins
1/29/2014	DG	0.1	double check notice form .1
1/29/2014	DG	0.1	edit email to JB re provision of email addresses and telephone numbers .1
1/29/2014	MA	6.4	assembling materials for mailing of notice (collating and folding notice and CTS in order to stuff envelopes for mailing)
1/29/2014	MR	2	help with notice mailing folding and stuffing envelopes
1/29/2014	JS	4	fold CTS and notice LTRs-- 1000+
1/29/2014	DG	0.5	prepare notice mailing - stuff envelopes .5
1/29/2014	CLER	1	prepare collective action mailing (1)
1/29/2014	CLER	3.1	prepare collective action mailing (3.1)
1/30/2014	AG	6.4	Arrangement of mailing materials (printing and reproduction CTS, Notice and collation of pages, mail fulfillment of addressing all envelopes, manual sealing of all mailpieces, manual insertion into mailing envelopes, etc)
1/30/2014	JP	0.3	jp/kw discussion of progress of filing state class actions .1 discussion of status of state class representation in Illinois .2
1/30/2014	DG	0.2	draft email to JB re Kellogg's nonprovision of email addresses. .2
1/30/2014	DG	0.2	draft email to def re shortage of names from CA on class list .2
1/30/2014	JP	1.5	reviewed names submitted by defense counsel to check why so few names from California. Researched our plaintiff notes about job titles in CA and other states
1/30/2014	JP	0.1	dg/jp discuss shortage of names from CA on class list .1
1/30/2014	DG	0.1	dg/jp discuss shortage of names from CA on class list .1
1/30/2014	KW	0.3	jp/kw discussion of progress of filing state class actions .1 discussion of status of state class representation in Illinois .2
1/30/2014	JP	0.4	called to confirm his job title and other people's job titles in Northern California to determine if names were left of class list
1/30/2014	KW	0.1	Review class list to determine number off California TMs listed-
1/30/2014	JP	0.1	left voice mail to confirm that he received state class retainer
1/30/2014	KW	0.8	work on processing mailing of collective action notice .8
1/30/2014	KW	2	process mailing of over 2000 court ordered collective action notices 2.0

Date	Staff	Amount of Time	Description
1/30/2014	MA	3.6	assembling materials for mailing of notice (collating and folding notice and CTS in order to stuff envelopes for mailing)
1/31/2014	AG	2.9	Arrangement of mailing materials (printing and reproduction CTS, Notice and collation of pages, mail fulfillment of addressing all envelopes, manual sealing of all mailpieces, manual insertion into mailing envelopes, etc)
1/31/2014	MR	1	initial work on matchup of clients and intakes to Kellogg notice list
1/31/2014	MD	0.1	md email defense counsel about status of withdrawing motion 0.1
1/31/2014	DG	0.6	dg/mr discuss merits of defs arguments for not providing corporate email addresses..2; legal research on EEOC case cited by def re corporate property interest in email addresses .4
1/31/2014	MR	0.2	dg/mr discuss merits of defs arguments for not providing corporate email addresses..2
1/31/2014	MD	0.2	md/dg discussing response to defense counsel about noncompliance with production of telephone numbers and email addresses 0.2
1/31/2014	MD	0.1	md review email from defense counsel about emails and telephone numbers 0.1
1/31/2014	DG	0.3	md/dg discussing response to defense counsel about noncompliance with production of telephone numbers and email addresses 0.2; review def email re same .1
1/31/2014	MD	0.6	md/dg call with defense counsel about email production for notice 0.6
1/31/2014	DG	0.6	md/dg call with defense counsel about email production for notice 0.6
2/3/2014	MR	0.1	DG/MR discuss question re DG's proposed description of CTS process .1
2/3/2014	MR	0.2	email to attys/para alternative suggestion for Def to email notice to employees themselves
2/3/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/3/2014	MR	2.5	continue and complete matchup of clients and intakes to Kellogg notice list 2.3; email results to attys/paras incl other questions about our TM data .2
2/3/2014	CLER	0.2	prepare welcome ltr to new client
2/3/2014	CLER	0.1	Data Entry of contact information of client
2/3/2014	MR	0.1	dg/mr review doublechecks re consents to make sure none missed .1
2/3/2014	DG	0.1	DG/MR discuss question re DG's proposed description of CTS process .1
2/3/2014	MD	0.2	md/dg discussing merits of motion to compel email addresses and benefit of motion 0.2
2/3/2014	MD	0.1	md/kw - discuss format of emailing notice and consent to those potential class members for whom defendant produced email address .1
2/3/2014	MR	2	dg/md/jp/ag/mr/kw litigation team meeting to determine accountability process for handling responses to notice- tracking filing of consents to sue, accuracy of data and double check the process
2/3/2014	JP	2	dg/md/jp/ag/mr/kw litigation team meeting to determine accountability process for handling responses to notice- tracking filing of consents to sue, accuracy of data and double check the process
2/3/2014	DG	2.5	dg/md/jp/ag/mr/kw litigation team meeting to determine accountability process for handling responses to notice- tracking filing of consents to sue, accuracy of data and double check the process 2; organize notes into written protocol for handling of CTSs .5
2/3/2014	MD	2	dg/md/jp/ag/mr/kw litigation team meeting to determine accountability process for handling responses to notice- tracking filing of consents to sue, accuracy of data and double check the process
2/3/2014	MR	0.3	read email and Def document from atty DG re Def's policy on email acceptable use

Date	Staff	Amount of Time	Description
2/3/2014	AG	1.8	Arrangement of mailing materials (printing and reproduction CTS, Notice and collation of pages, mail fulfillment of addressing all envelopes, manual sealing of all mailpieces, manual insertion into mailing envelopes, etc)
2/3/2014	JP	0.5	review intakes who were not on class list but in our system to confirm that they should not get a CTS
2/3/2014	MD	0.1	md review kellogg IT use policy 0.1
2/3/2014	DG	0.1	dg/mr review doublechecks re consents to make sure none missed .1
2/3/2014	MR	0.2	read DG proposed description of CTS process .2
2/3/2014	JP	0.1	dg/jp discuss CTS filing internal/external process to make sure not missed .1
2/3/2014	DG	0.1	dg/jp discuss CTS filing internal/external process to make sure not missed .1
2/3/2014	DG	0.2	review Kellogg's acceptable use policy re IT .2
2/3/2014	MD	0.5	md editing class action complaint 0.5
2/3/2014	KW	0.1	open case contact for new opt-in .1
2/3/2014	KW	0.7	fact finding interview with plaintiff who is experiencing reduced compensation for personal vehicle use and questions if this is retaliation by Kellogg .4 organize information and add to case notes .2 email notes and questions to litigation team .1
2/3/2014	KW	0.3	open case contact for new plaintiff .1 email reponse to plaintiff's questions .2
2/3/2014	KW	0.2	telephone call form putative class member to discuss notice and timeframed for response add information to case notes
2/3/2014	KW	0.4	research 2nd list produced by defendant to find complete names and addresses for 6 potential class members to process mailing Noitce.4
2/3/2014	KW	2	dg/md/jp/ag/mr/kw Itigation team meeting to determine accountability process for handling responses to notice- tracking filing of consents to sue, accuracy of data and double check the process
2/3/2014	KW	0.2	respond to questions from putative class member regarding mailing of Notice and joining this lawsuit .1 add information to case notes .1
2/3/2014	DG	0.2	review settlement edits .2
2/3/2014	MR	0.2	read atty MD draft notice for email
2/3/2014	KW	0.1	md/kw - discuss format of emailing notice and consent to those potential class members for whom defendant produced email address .1
2/3/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#176 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Marie Boulton)(Dunn, Matt)
2/3/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Marie Boulton)
2/3/2014	DG	0.2	md/dg discussing merits of motion to compel emails addresses and benefit of motion 0.2
2/3/2014	CM	0.8	prepare collective action mailing (.8)
2/3/2014	MR	1.3	work out better formatting for email notice 1.1, email to attys/para about problems with notice and workaround .2
2/3/2014	AG	2	dg/md/jp/ag/mr/kw Itigation team meeting to determine accountability process for handling responses to notice- tracking filing of consents to sue, accuracy of data and double check the process
2/4/2014	AG	0.3	jp/ag review omissions or errors data
2/4/2014	MR	0.4	mr/kw plan mass emailing of court ordered notice and consent to sue .1 review issues related to tracking filed consents and updating docket, plan needed process revisions .3
2/4/2014	MD	0.2	md/dg/mr discussing issuance of notice to class members 0.2

Date	Staff	Amount of Time	Description
2/4/2014	KW	0.5	respond to initial call from putative class member seeking information about complaint .3 open case contact.1 add information to case notes .1
2/4/2014	KW	0.4	mr/kw plan mass emailing of court ordered notice and consent to sue .1 review issues related to tracking filed consents and updating docket, plan needed process revisions .3
2/4/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#109 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Erwin Recalde)(Getman, Dan)
2/4/2014	JP	1.8	jp/kw review electronic data for each plaintiff, review ECF docket of filing of consents to sue, reveiw electronic file of signed and redacted consents to sue-compare all files and correct any omissions or errors
2/4/2014	KW	1.8	jp/kw review electronic data for each plaintiff, review ECF docket of filing of consents to sue, reveiw electronic file of signed and redacted consents to sue-compare all files and correct any omissions or errors
2/4/2014	CLER	0.2	Data Entry of contact information of intakes
2/4/2014	DG	0.3	md/dg discussing defense counsel's proposal to submit joint motion re Kellogg's non-production of company emails 0.3
2/4/2014	MD	0.2	call from Jim re doing a joint letter on issue of email names and addresses .2
2/4/2014	KW	0.9	work on emailing court ordered notice and consent form to list provided by Kellogg .9
2/4/2014	MD	0.3	md/dg discussing defense counsel's proposal to submit joint motion re Kellogg's non-production of company emails 0.3
2/4/2014	AG	2	Delivery of Noitce to USPS (Newburgh/New Paltz)
2/4/2014	DG	0.1	review def withdrawal of motion terms .1
2/4/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#177 - NOTICE to Withdraw Pending Motion re [164] MOTION to Compel Each Plaintiff's Responses to First Set of Interrogatories ; by Defendants Kellogg Company, Kellogg Sales Company. (Nelson, James)
2/4/2014	JP	0.3	jp/ag review omissions or errors data
2/4/2014	AG	0.2	correct omissions or errors in docket files
2/4/2014	MD	0.2	md reviewing local rules re submitting joint motion regarding kellogg's refusal to issue company emails 0.2
2/4/2014	DG	0.2	call from Jim re doing a joint letter on issue of email names and addresses .2
2/4/2014	MD	0.1	md review notice that was issued 0.1
2/4/2014	DG	0.2	md/dg/mr discussing issuance of notice to class members 0.2
2/4/2014	DG	0.1	dg/ag discuss difficulty experienced getting mail out, but confirming it went .1
2/4/2014	AG	0.1	dg/ag discuss difficulty experienced getting mail out, but confirming it went .1
2/4/2014	JP	0.1	dg/kw/jp discuss emailing of notice .1
2/4/2014	KW	0.1	dg/kw/jp discuss emailing of notice .1
2/4/2014	DG	0.1	dg/kw/jp discuss emailing of notice .1
2/6/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#178 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Dennis Bargerhuff, Tony L. Blackwell, Angel L. Cruz, Michael J. Hetrick, Christopher J. Horvath, Joseph P. Kelly, Michael E. Olson, Adam Pedraza, John Rahija, Dawn Segar and Edward M. Smith)(Dunn, Matt)
2/6/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Dennis Bargerhuff, Tony L. Blackwell, Angel L. Cruz, Michael J. Hetrick, Christopher J. Horvath, Joseph P. Kelly, Michael E. Olson, Adam Pedraza, John Rahija, Dawn Segar and Edward M. Smith)

Date	Staff	Amount of Time	Description
2/6/2014	KW	0.2	email response to putative class member who has questions about proving hours of Overtime worked .2
2/6/2014	KW	0.4	repsond to questions from former RSR regarding details and purposes of this lawsuit to assist her in deciding to join or not .3 open case contact .1
2/6/2014	JP	0.1	email AG to file a correction with courts on the spelling of her name in her CTS filing
2/6/2014	JP	0.1	respond with email to internet query
2/6/2014	JP	0.5	MR/JP discuss how to set up a system to make sure all consents are file, that there are no mistakes in our system, and to reconcile both
2/6/2014	MR	0.2	mr/kw discuss several problem emailed consents and how to resolve issues of readability .1
2/6/2014	MD	0.1	md edit email to intake about recording of hours 0.1
2/6/2014	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/6/2014	MD	0.1	md email defense counsel about Kellogg's email policy 0.1
2/6/2014	MR	0.5	MR/JP discuss how to set up a system to make sure all consents are file, that there are no mistakes in our system, and to reconcile both
2/6/2014	MD	1	md drafting amended complaint 1.0
2/6/2014	CLER	0.4	Data Entry of contact information of client
2/6/2014	KW	0.8	review file of undelivered emails of court ordered notice .2 identify those that appear to be a transcription error in being produced to our office .2 correct apparent errors and resend court ordered notice and consent form .4
2/6/2014	JS	0.1	tc asking for jp
2/6/2014	CLER	0.5	prepare welcome ltr to new client
2/6/2014	KW	0.2	reach out to plaintiff to explore interest in being named Plaintiff in state class action .2
2/6/2014	JP	0.5	fact finding intake .4; email CTS .1
2/6/2014	CLER	0.2	Data Entry of contact information of clients
2/6/2014	JP	0.7	fact finding intake interview and discussion about lawsuit .6; email CTS as requested .1
2/6/2014	KW	0.8	respond to requests for information about lawsuit from putative class members who have received court ordered notice .6 forward consents to sue to A. Garcia-paralegal handling filings .2
2/6/2014	MD	2.5	md drafting memo concerning kellogg's noncompliance with providing Plaintiffs with email addresses and telephone numbers to assit with issuing notice 2.5
2/6/2014	DG	1.6	prepare email response to class member with question re hours worked .1; edit def prepared joint letter re email dispute .5; draft letter re failure of K to provide email addresses 1
2/6/2014	KW	0.4	email and telephone call response to attorney spouse of plaintiff [ ]- to respond to his questions re lawsuit .3 add information to case notes .1
2/6/2014	JP	0.4	called to discuss applying for jobs with Kelloggs and not being given interviews as age discrimination
2/6/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/6/2014	KW	0.2	mr/kw discuss several problem emailed consents and how to resolve issues of readability .1
2/6/2014	CLER	0.2	discuss follow-up for emails that bounced back .1
2/6/2014	CLER	0.2	prepare welcome ltr to new client
2/6/2014	MD	0.4	md researching cases that permitted Plaintiffs' counsel to send notice to class members work email address 0.4
2/7/2014	MA	0.1	call from putative class member re: consent to sue form
2/7/2014	CLER	0.1	Data Entry of contact information of client

Date	Staff	Amount of Time	Description
2/7/2014	JP	0.4	questions about retaliation if joining
2/7/2014	AG	0.2	prepare NOTICE of Filing of Corrected Spelling of Consent to Sue re: (Document#74-3)
2/7/2014	JP	0.8	add new state facts to 3rd ammended complaint
2/7/2014	JP	0.2	em and vm about proof of job title of TM
2/7/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#179 - NOTICE of Filing of Corrected Spelling of Consent to Sue (Document#74-3) ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Lisa Lajoie)(Dunn, Matt)
2/7/2014	JP	0.5	fact finding intake and discussion about how lawsuits work
2/7/2014	AG	0.2	ECF Filing of NOTICE of Filing of Corrected Spelling of Consent to Sue (Document#74-3) (Attachments: # (1) Consent to Sue of Lisa Lajoie)
2/7/2014	DG	0.2	md/dg discussing strategy in dealing with joint motion concering Kellogg's refusal to provide company email addresses 0.2
2/7/2014	MR	1	read Def documents EU1 IT Policy and EU2 Email Policy; calculate approx hard drive space used by 2000 notice emails; email to attys regarding aspects of EU2 email policy and hard drive space
2/7/2014	JP	1.3	create spreadsheets from zone rosters to determine if all potential plaintiffs names were turned over
2/7/2014	MD	0.2	md/dg discussing edits to kellogg's proposed letter brief and procedure for submitting dispute to Court 0.2
2/7/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Thomas P. Carlson, Brian Flynn, Michael J. Forte, Douglas C. Gantt, Michael W. Reid, and Jan Zindt.)
2/7/2014	CLER	0.2	prepare welcome ltr to new client
2/7/2014	JP	0.4	called for update on case and to let us know he was fired by Kellogg
2/7/2014	CLER	0.2	Data Entry of contact information of clients
2/7/2014	CLER	0.3	prepare welcome ltr to new clients
2/7/2014	CLER	0.2	prepare welcome ltr to new client
2/7/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/7/2014	CLER	0.3	prepare welcome ltr to new clients
2/7/2014	JP	0.7	called to find out if she could join the case on behalf of her deceased husband, .6; em attorneys relevant questions .1
2/7/2014	CLER	0.2	Data Entry of contact information of clients
2/7/2014	MD	1	md editing complaint to including IL class action claims and adding additional named plaintiff to MN class 1.0
2/7/2014	MD	3	md editing joint letter to court re kellogg's refusal to provide email and researching relevant caselaw 3.0
2/7/2014	DG	0.2	md/dg discussing strategy in dealing with joint motion concering Kellogg's refusal to provide company email addresses 0.2
2/7/2014	MR	0.5	fix several notes with lost contact name .5
2/7/2014	JP	0.1	create spreadsheets to review if defendants turned over all names of potential plaintiffs
2/7/2014	MD	0.2	md/dg discussing strategy in dealing with joint motion concering Kellogg's refusal to provide company email addresses 0.2
2/7/2014	DG	3.3	dg/mr discuss Kellogg's IT and email policy arguments .2; draft letter to J Leighton re Kellogg's nonprovision of names 2.6; 2nd edit re same .5
2/7/2014	MR	0.2	dg/mr discuss Kellogg's IT and email policy arguments .2
2/7/2014	DG	0.2	md/dg discussing edits to kellogg's proposed letter brief and procedure for submitting dispute to Court 0.2



Date	Staff	Amount of Time	Description
			respond to email requests for information about Notice and Consent to Sue form putative class members .4 archive consents to sue we receive by email for accountability
2/10/2014	KW	0.6	.2
2/10/2014	AG	0.3	conduct address verificate via westlaw(RTS notices)
2/10/2014	CLER	0.7	prepare welcome ltr to new clients
			Transfer documents recd from ECF system to docket file and create file copy(Docket#180 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Thomas P. Carlson, Brian Flynn, Michael J. Forte, Douglas C. Gantt, Michael W. Reid, and Jan Zindt.)(Dunn, Matt)
2/10/2014	CLER	0.1	
2/10/2014	AG	0.9	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/10/2014	CLER	0.5	Data Entry of contact information of clients
2/10/2014	JS	0.1	added contact to tm, passed to JP vm
			ECF Filing of NOTICE of Filing of Consent to Sues and Attachments: # (1) Consent to Sues of Lisa J. Baldrige, Daron J. Ballard, Marie Boulton, Christopher L. Cabello, Gorman Champion, Patrick Cox, James D. Dennis, Shannon DiRose, Corey M. Estok, Greg Findlay, Eddie Garcia and Robert A. Haley., # (2) Consent to Sues of Gregory Hillman, John E. Jones, Mike Kapustka, Karen A. LaRocca, John Lucarelli, Efrain Montemayor, Luis S. Moreno, Bradley E. Neal, James M. Robinette, Derrick Z. Seabaugh, Paul Sylvester, Esteban Tijerina and John E. Wetter.)
2/10/2014	AG	0.3	
2/10/2014	KW	0.9	initial intake interview .7 open case contact .1 update case information .1
2/10/2014	KW	0.3	jp/kw discussion of import of documentation of lost variable labor hours submitted by plaintiff [ ] .2 discussion of additional information needed .1
2/10/2014	CLER	0.6	Data Entry of contact information of client
2/10/2014	DG	0.1	md/dg discussing strategy concerning dispute re non-production of email addresses 0.1
			respond to email questions regarding lawsuit .2 open case contacts .1 update case information .1
2/10/2014	KW	0.4	
			initial intake interview and answer questions regarding lawsuit .5 open case contacts .1
2/10/2014	KW	0.7	update case information .1
			respond to email questions regarding lawsuit .2 open case contacts .1 update case information .1
2/10/2014	KW	0.4	
2/10/2014	MR	0.2	experiment with tracking CTS documents using hyperlink in Time Matters .2
			initial intake call form putative class member very concerned about possible retaliation if he joins this lawsuit .4 open case contact .1 add information to case notes .1
2/10/2014	KW	0.6	
2/10/2014	MD	0.1	md/dg discussing strategy concerning dispute re non-production of email addresses 0.1
			jp/kw discussion of import of documentation of lost variable labor hours submitted by plaintiff A. McMahan .2 discussion of additional information needed .1
2/10/2014	JP	0.3	
2/10/2014	JP	0.1	JP/MR discuss value of tracking CTS documents using hyperlink in Time Matters .1
2/10/2014	MR	0.1	JP/MR discuss value of tracking CTS documents using hyperlink in Time Matters .1

Date	Staff	Amount of Time	Description
			Transfer documents recd from ECF system to docket file and create file copy(Docket#182 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Mark F. Bonn, Andrea Weiland Burgoa, Corey F. Chase, Jerome W. Cortazzo, Sinead C. DeRoiste, Jeff Evans, Bret R. Hanisch, Johnny Hincer, Elizabeth N. Jansen, Brion Knepp and Robert LaPelle., # (2) Consent to Sues of Larry Larson, Sam A. Marzula Jr., Charles A. Mencias, Leeann Morningstar, Michelle M. Nyers, Alex M. Orosz, Karen Rogers, William R. Trout, Thomas C. Tuck, Kenneth Watson, Robert Wiltsie, and
2/11/2014	CLER	0.2	Stephen Ron Yelman.)(Dunn, Matt)
2/11/2014	MD	0.3	md call with intake about retaliation concerns 0.3
2/11/2014	JS	0.1	called for KW, will call back around 4PM
			ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Mark F. Bonn, Andrea Weiland Burgoa, Corey F. Chase, Jerome W. Cortazzo, Sinead C. DeRoiste, Jeff Evans, Bret R. Hanisch, Johnny Hincer, Elizabeth N. Jansen, Brion Knepp and Robert LaPelle., # (2) Consent to Sues of Larry Larson, Sam A. Marzula Jr., Charles A. Mencias, Leeann Morningstar, Michelle M. Nyers, Alex M. Orosz, Karen Rogers, William R. Trout, Thomas C. Tuck, Kenneth Watson, Robert Wiltsie, and Stephen Ron Yelman.)
2/11/2014	AG	0.3	Trout, Thomas C. Tuck, Kenneth Watson, Robert Wiltsie, and Stephen Ron Yelman.)
2/11/2014	JS	0.1	called for info re: Kellogg; entered contact in tm, ref to KW
			initial intake call from putative class member .3 open case contact .1 add information to
2/11/2014	KW	0.5	case notes .1
2/11/2014	MR	0.3	some research about bandwidth regarding Kellogg ESI agreement issues
			Response to questions of putative class member concerning impact of severance agreement on eligibility to join lawsuit .2 open case contact.1 update case information
2/11/2014	KW	0.4	.1
2/11/2014	CLER	0.3	Data Entry of contact information of clients
2/11/2014	CLER	0.4	prepare welcome ltr to new client
			initial Intake interview .5 organize information and add to case file .2 open case contacts
2/11/2014	KW	0.8	.1
2/11/2014	MD	0.3	md reviewing kellogg's additional edits to letter re nonproduction of company emails 0.3
2/11/2014	MR	0.1	dg/mr discuss technical issue of def sending notice via intranet .1
2/11/2014	DG	0.1	dg/mr discuss technical issue of def sending notice via intranet .1
			Transfer documents recd from ECF system to docket file and create file copy(Docket#181 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Lisa J. Baldrige, Daron J. Ballard, Marie Boulton, Christopher L. Cabello, Gorman Champion, Patrick Cox, James D. Dennis, Shannon DiRose, Corey M. Estok, Greg Findlay, Eddie Garcia and Robert A. Haley., # (2) Consent to Sues of Gregory Hillman, John E. Jones, Mike Kapustka, Karen A. LaRocca, John Lucarelli, Efrain Montemayor, Luis S. Moreno, Bradley E. Neal, James M. Robinette, Derrick Z. Seabaugh, Paul Sylvester, Esteban Tijerina and John E. Wetter.)(Dunn, Matt)
2/11/2014	CLER	0.2	Paul Sylvester, Esteban Tijerina and John E. Wetter.)(Dunn, Matt)
2/11/2014	MD	1.5	md editing joint letter to court re kellogg's refusal to supply company email addresses 1.5
2/11/2014	MR	1.3	web research about Kellogg IT systems for use in declaration to rebut Def Counsel claims
			review data sent by plaintiff showing she did not receive 396 hours of variable labor that she had earned .2 draft email to plaintiff [ ] asking for explanations of some of the data
2/11/2014	KW	0.6	presented .2 update case information .1 save document to client's document file .1

Date	Staff	Amount of Time	Description
2/11/2014	CLER	0.5	prepare welcome ltr to new clients
2/11/2014	JP	0.6	fact finding intake
2/11/2014	AG	1.1	prepare remailing of notice, printing and reproduction of mailing envelopes and mail fulfillment re; addressing of all envelopes (RTS with forwarding address)
2/11/2014	CLER	0.6	Data Entry of contact information of clients
2/11/2014	CLER	0.2	prepare Fedex Label for client mailing to documents
2/11/2014	MD	0.2	dg/md discuss how to handle def's edits and logistics of a joint filing .2
2/11/2014	DG	0.2	dg/md discuss how to handle def's edits and logistics of a joint filing .2
2/11/2014	MR	0.2	examine Kellogg draft joint stipulation ltr on ESI
2/11/2014	AG	1	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing draft list of K arguments we must respond to, re corporate email addresses not provided
2/11/2014	DG	1.1	.6; edit letter to court re this dispute .5
2/11/2014	KW	0.4	telephone discussion of employment at Kellogg with plaintiff [ ]-who had questions regarding any possibility of retaliation .3 update case information
2/11/2014	KW	0.2	review procedures and protocols developed to handle accountability of filing consents to sue and case information .1 print memo for reference .1
2/11/2014	CLER	0.2	create PDF format of documents recd from Defendants
2/11/2014	KW	0.4	telephone call from anonymous current employee frightened of retaliation .4
2/12/2014	JP	0.9	md/dg/jp/kw discussing filing j. doe consent to sue forms for current employees afraid of retaliation and amending the complaint 0.9
2/12/2014	KW	0.9	md/dg/jp/kw discussing filing j. doe consent to sue forms for current employees afraid of retaliation and amending the complaint 0.9
2/12/2014	MD	0.9	md/dg/jp/kw discussing filing j. doe consent to sue forms for current employees afraid of retaliation and amending the complaint 0.9
2/12/2014	CM	0.6	jp/ag/mr/cm/kw meeting to review process for accountability for original consents to sue received, ECF docket, electronic file of docket and Time Matters data develop process to refine process and build in accountability for accuracy
2/12/2014	JP	0.6	jp/ag/mr/cm/kw meeting to review process for accountability for original consents to sue received, ECF docket, electronic file of docket and Time Matters data develop process to refine process and build in accountability for accuracy
2/12/2014	AG	0.6	jp/ag/mr/cm/kw meeting to review process for accountability for original consents to sue received, ECF docket, electronic file of docket and Time Matters data develop process to refine process and build in accountability for accuracy
2/12/2014	MD	0.4	md editing letter to Judge regarding company emails 0.4
2/12/2014	KW	0.4	telephone call from plaintiff [ ] concerning signed retainer to be state class representative for Illinois .1 email information to paralegal J Pickering who is coordinating state class actions .1 email information to plaintiff [ ] .1 update plaintiff's electronic information base .1
2/12/2014	DG	0.3	read def's edits to letter brief re company emails .3
2/12/2014	KW	0.4	read, edit, revise draft of attorney client privilege form to be used in filing J. Doe consents to sue
2/12/2014	KW	0.6	initial intake discussion with putative class member .4 open case contact .1 add information to case notes .1
2/12/2014	DG	0.1	md/dg discussing kellogg's edits to joint letter 0.1

Date	Staff	Amount of Time	Description
2/12/2014	KW	0.6	jp/ag/mr/cm/kw meeting to review process for accountability for original consents to sue received, ECF docket, electronic file of docket and Time Matters data develop process to refine process and build in accountability for accuracy
2/12/2014	KW	0.6	respond to questions regarding Notice and lawsuit complaint and process from spouse of putative class member .4 open case contact .1 add information to case notes .1
2/12/2014	CLER	0.6	prepare welcome ltr to new clients
2/12/2014	MD	0.1	md/dg discussing kellogg's edits to joint letter 0.1
2/12/2014	DG	0.9	md/dg/jp/kw discussing filing j. doe consent to sue forms for current employees afraid of retaliation and amending the complaint 0.9
2/12/2014	KW	0.9	Carefully read 3rd Amended complaint to fact check regarding plaintiffs' information, spell check of Plaintiffs' names and read for clarity edit as needed
2/12/2014	JS	0.1	[putative class member] called re: questions about suit and letter--ref. to KW
2/12/2014	CLER	0.6	prepare welcome ltr to new clients
2/12/2014	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/12/2014	CLER	0.5	Data Entry of contact information of clients
2/12/2014	JS	0.1	call for KW re: case [client]
2/12/2014	JP	0.3	KW/JP - discuss how to determine when and how to offer a J. Doe filing with potential plaintiffs
2/12/2014	MD	1	md drafting notice re j. doe filing of consent to sue 1.0
2/12/2014	MD	0.1	md/kw discussing edits to third amended complaint 0.1
2/12/2014	MR	0.6	jp/ag/mr/cm/kw meeting to review process for accountability for original consents to sue received, ECF docket, electronic file of docket and Time Matters data develop process to refine process and build in accountability for accuracy
2/12/2014	KW	0.2	jp/kw discuss revisions to attorney-client privilege form for filing J. Doe consents .1 discuss how to resolve issues involving discovery and damages of J. Doe plaintiffs .1
2/12/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Broderick Brookshire, Charles Grabowski, Erick Matson, William T. Olander, Arthur Pedersen, Edward Jerry Prager, Monica L. Rook, Piarus Tatum, Reginald Taylor, Dusty Veach and Julie Vihstadt.)
2/12/2014	JP	0.2	jp/kw discuss revisions to attorney-client privilege form for filing J. Doe consents .1 discuss how to resolve issues involving discovery and damages of J. Doe plaintiffs .1
2/12/2014	KW	0.2	research billing time forms to determine date plaintiffs' data was reviewed and consent filing status was verified to determine where to start next accountability review .1 email information to paralegal team working on this project .1
2/12/2014	KW	0.3	KW/JP - discuss how to determine when and how to offer a J. Doe filing with potential plaintiffs
2/12/2014	CM	0.1	review team email correspondence in preparation for meeting re consent to sue tracking (.1)
2/12/2014	CLER	0.3	prepare welcome ltr to new clients
2/12/2014	CLER	0.2	Data Entry of contact information of clients
2/12/2014	MR	3	create 1st draft of declaration for reply to Def arguments about company emails 3.0 (continued overnight - made 2nd entry)
2/13/2014	JP	0.6	fact finding intake
2/13/2014	MR	0.5	review atty MD edits to declaration .2, add my edits in response .3

Date	Staff	Amount of Time	Description
2/13/2014	JP	0.1	emailed consent to sue in response to email request for update
2/13/2014	JP	0.1	called and left message for him to call for an intake
2/13/2014	DG	1.4	review and edit letter re corp email addresses .6; edits to MR declaration re same .4; emails to litigation team re approach to take .2; edits to def draft letter .2
2/13/2014	MR	1.5	copy prior revisions over to correct version of declaration .2, research bandwidth costs .8; add footnote analysis of bandwidth costs and total cost of notice emailing .4; email latest revision of declaration to attys .1
2/13/2014	MR	2.7	extensive web research to find reference as to how to add email address to whitelist in Websense Email Security 2.5; revise declaration to explain how email address in added to global whitelist in Websense 7.0
2/13/2014	JP	0.4	fact finding intake
2/13/2014	MD	0.2	md providing defense counsel with edits to letter re emails 0.2
2/13/2014	MR	0.1	email to attys about need for add'l revisions to declaration
2/13/2014	DG	0.9	reviewed def changes to letter to j Leighton re email addresses .2; edit letter to add additional argument .3; edit MR declaration in support .4
2/13/2014	JP	0.6	fact finding intake
2/13/2014	MR	0.2	complete 1st draft of declaration for reply to Def arguments about company emails .1, email to attys regarding declaration .1
2/13/2014	MD	0.5	md reviewing and editing mr declaration 0.5
2/13/2014	MR	0.1	email to attys about suggestions for edits to declaration
2/13/2014	MR	1	make additional revisions to declaration .9, send email to attys in regard to these revisions .1
2/14/2014	JS	0.1	tc to confirm receipt of faxed CTS
2/14/2014	MD	0.2	md/mr discussing edits to mr declaration and reviewing exhibit in support
2/14/2014	MR	0.2	md/mr discussing facts in MR declaration and arguments made in briefing re motion for company email addresses 0.2
2/14/2014	MD	0.5	md editing letter regarding Kellogg's non-production of company emails
2/14/2014	MD	0.1	md respond to JP about additional named plaintiff 0.1
2/14/2014	MD	0.2	md/mr discussing facts in MR declaration and arguments made in briefing re motion for company email addresses 0.2
2/14/2014	JP	0.6	called to discuss current issues with age discrimination against Kellog
2/14/2014	MR	0.1	md/mr review edits to mr declaration 0.1
2/14/2014	MD	0.1	md/mr review edits to mr declaration 0.1
2/14/2014	DG	0.1	md/dg discussing edits to letter re email notice 0.1
2/14/2014	MR	0.5	edit mrusso declaration pdf exhibit so relevant section is circled
2/14/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#184 - ORDER REGARDING INITIAL DISCLOSURES AND JOINT STATUS REPORT Joint Status Report due by 3/14/2014, by Judge Ronald B. Leighton. (DN)
2/14/2014	CLER	2.1	Data Entry of contact information of new clients
2/14/2014	MR	0.2	md/mr discussing edits to mr declaration and reviewing exhibit in support
2/14/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#183 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Broderick Brookshire, Charles Grabowski, Erick Matson, William T. Olander, Arthur Pedersen, Edward Jerry Prager, Monica L. Rook, Piarus Tatum, Reginald Taylor, Dusty Veach and Julie Vihstadt.)(Dunn, Matt)

Date	Staff	Amount of Time	Description
2/14/2014	AG	0.4	ECF Filing of NOTICE of Filing of Consent to Sues Attachments: # (1) Consent to Sues of Nicolas E. Arneson, Raymond Bass Jr., Matthew Bench, Alan W. Bolding, Jeff Bostie, James W. Carnes, Vicki J. Cook, Stephanie Couture, Richard DeWald, Dale Dolechek and John Feher., # (2) Consent to Sues of James Manly Hobbs, Michelle Hutte, Chad Gasterland, James M. Gooch, Rondell Jones II, Mark Kohlhausen, Raymond Laird, Derrick Lockett, Jeff Monroe, James P. Morgan, and Nancy Moquist., # (3) Consent to Sues of David J. Pearce, Brenda Potratz, Melanie Y. Richard, Joseph Restivo, Michael Schram, Mark A. Sikorg, Paul C. Shoemaker, Jeffery Smith, Scot Smith, William Smith and Douglas J. Speer.)
2/14/2014	MD	0.1	md review court order concerning initial disclosures and joint status report 0.1
2/14/2014	AG	0.4	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Dale Stewart, Fiona Stimus, Jason Williams, Gregory C. Atchley, Keith Bishop, Vickie Jo Bolles, Richard Briggs, David H. Brown, Daniel J. Bustad, Rhonda Canterberry, and Randy Hansen., # (2) Consent to Sues of David H. Hasenbein, Joe Hernandez, Michael Garrett, Justin Avery Godfrey, Jennifer Gust, Susan K. Larkins, Kimberly J. Pasch, Edward L. Pence, Bruce W. Johnson, Jason Ledbetter and Walter C. Loyd., # (3) Consent to Sues of Catherine McCabe, Michael McCoy, Scott Osborne, Melanie Payne, Danny W. Peavler, Thomas Rankin, John Richardson, Linda K. Wilson, Alexis Vazquez, Wade Washburn, Deena Waters and Steven Wochner.)
2/14/2014	DG	0.1	DG/MR discuss legal phrase used in declaration for holding reasonable knowledge
2/14/2014	MR	0.3	read through brief, particularly references to mr declaration and edit as necessary
2/14/2014	MR	0.1	DG/MR discuss legal phrase used in declaration for holding reasonable knowledge
2/14/2014	MD	0.3	md speaking with defense counsel about motion concerning emails 0.3
2/14/2014	MR	0.2	email to attys regarding changes made in declaration for reference in adding email address to whitelist .2
2/14/2014	JP	0.3	review email and resume .1; discuss with MD how to handle issues .1; vm request for him to call for intake
2/14/2014	JP	0.1	vm in response to his concern about
2/14/2014	MD	0.1	md/dg discussing edits to letter re email notice 0.1
2/14/2014	JP	0.4	called to confirm that we received his CTS, did not get it, he will resend. asked about case and proof issues
2/14/2014	MD	0.2	md editing letter brief re nonproduction of company emails
2/14/2014	MR	0.4	assist atty MD in searching for source of quote in brief re: Kellogg ethics
2/14/2014	CLER	0.1	create PDF format of retainer recd from client
2/14/2014	MD	0.1	md/jp discussing email for CO intake about possibility becoming an expert 0.1
2/14/2014	JP	0.1	md/jp discussing email for CO intake about possibility becoming an expert 0.1
2/14/2014	CM	2.7	reconcile pacer list of consents to sue with time matters client list (2.7)
2/14/2014	JP	0.1	VM in response to internet query
2/15/2014	MR	0.2	email attys some briefing points for dispute over Def email addresses
2/18/2014	MD	0.2	md/jp/kw discuss issues to be resolved before filing J Doe consents to sue .2
2/18/2014	JP	0.1	called and left vm for intake
2/18/2014	CLER	0.3	prepare exhibits for motion regarding Kellogg providing emails for notice .2 organize and update electronic filing folder .1
2/18/2014	JP	0.2	md/jp/kw discuss issues to be resolved before filing J Doe consents to sue .2



Date	Staff	Amount of Time	Description
2/18/2014	KW	0.3	telephone discussions with putative class member to facilitate correct filing of consent to sue .2 forward correct consent for filing .1
2/18/2014	MR	0.2	considerations regarding organization of case consents to sue .1, email to paras JP, CM .1
2/18/2014	KW	0.2	respond to email from plaintiff regarding current contact information .1 update contact information in case files .1
2/18/2014	JP	0.6	fact finding intake with wife of plaintiff
2/18/2014	DG	0.1	review def proposed chgs to letter re email addresses .1
2/18/2014	JP	0.1	vm for intake on facts of hours worked for Kellogg
2/18/2014	KW	0.3	respond to opt-in plaintiffs .2 process consents to sue submitted through email .1
2/18/2014	MD	0.3	md/dg discussing edits to letter brief re kellogg's refusal to provide company email addresses 0.3
2/18/2014	DG	0.3	md/dg discussing edits to letter brief re kellogg's refusal to provide company email addresses 0.3
2/18/2014	AG	0.3	re mailing notices with updated address
2/18/2014	KW	0.2	md/jp/kw discuss issues to be resolved before filing J Doe consents to sue .2
2/18/2014	JP	0.4	jp/kw discuss issues to be resolved in filing J. Doe consents to sue .4
2/18/2014	JP	0.7	fact finding intake
2/18/2014	KW	0.4	jp/kw discuss issues to be resolved in filing J. Doe consents to sue .4
2/18/2014	KW	0.3	review and update electronic file of consents to sue submitted through "MyFax"
2/18/2014	AG	0.4	conduct address verification of RTS mailing (Notices)
2/18/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#185 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Nicolas E. Arneson, Raymond Bass Jr., Matthew Bench, Alan W. Bolding, Jeff Bostie, James W. Carnes, Vicki J. Cook, Stephanie Couture, Richard DeWald, Dale Dolechek and John Feher., # (2) Consent to Sues of James Manly Hobbs, Michelle Hutte, Chad Gasterland, James M. Gooch, Rondell Jones II, Mark Kohlhausen, Raymond Laird, Derrick Lockett, Jeff Monroe, James P. Morgan, and Nancy Moquist., # (3) Consent to Sues of David J. Pearce, Brenda Potratz, Melanie Y. Richard, Joseph Restivo, Michael Schram, Mark A. Sikorg, Paul C. Shoemaker, Jeffery Smith, Scot Smith, William Smith and Douglas J. Speer.)(Dunn, Matt)
2/18/2014	MR	0.1	read email from para JP about time studies and reply to attys/para regarding usefulness of time studies .2
2/18/2014	JP	0.7	fact finding intake
2/18/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#186 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Dale Stewart, Fiona Stimus, Jason Williams, Gregory C. Atchley, Keith Bishop, Vickie Jo Bolles, Richard Briggs, David H. Brown, Daniel J. Bustad, Rhonda Canterbury, and Randy Hansen., # (2) Consent to Sues of David H. Hasenbein, Joe Hernandez, Michael Garrett, Justin Avery Godfrey, Jennifer Gust, Susan K. Larkins, Kimberly J. Pasch, Edward L. Pence, Bruce W. Johnson, Jason Ledbetter and Walter C. Loyd., # (3) Consent to Sues of Catherine McCabe, Michael McCoy, Scott Osborne, Melanie Payne, Danny W. Peavler, Thomas Rankin, John Richardson, Linda K. Wilson, Alexis Vazquez, Wade Washburn, Deena Waters and Steven Wochner.)(Dunn, Matt)
2/18/2014	MD	1	md editing letter for submission to court re email dispute 1.0

Date	Staff	Amount of Time	Description
2/18/2014	JP	0.7	discussed facts of employment and offer to be an expert witness .6; email that we could not use him as expert witness but he can join case .1
2/18/2014	CLER	0.2	create PDF format of correspondence recd from D. ( Discovery requests)
2/18/2014	JP	0.1	respond to email re change of address,
2/18/2014	KW	0.5	jp/kw meet to clarify and resolve issues regarding [client]'s withdrawal of consent .5
2/18/2014	CLER	0.8	Data Entry of contact information of clients
2/18/2014	KW	0.2	telephone call from plaintiff [ ] regarding case progress .1 update case notes .1
2/18/2014	JP	0.5	jp/kw meet to clarify and resolve issues regarding [client]'s withdrawal of cosnent .5
2/18/2014	JP	0.3	fact finding intake
2/18/2014	JP	0.1	vm for intake on facts of overtime with Kellogg
2/18/2014	JP	0.1	talked to wife, she gave outline of work with Kellogg, will have him call.
2/18/2014	AG	0.3	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of James J. Arre, Angela Borgstedt, Ronald Brown, Kelly A. Embert, Raul Galvan, Kurt A. Harris,Jr., Kenneth E. Hoak, Christopher W. King, Randy Kuchenbecker and Adam MacDormand., # (2) Consent to Sues of Dean R. Moran Jr., Gregory J. Oyster, Marcus Perez, Michael F. Phillips, Thomas H. Priaulx, Richard Robertson, Anthony J. Rosa, Amy L. Rutmann, Richard Stutes and Richard M. Volk., # (3) Consent to Sues of Christopher Adams, Wesley T. Berry Jr., Travis Boyer, Vicki A. Brzozowski, Clare Buhrandt, Bryan L. Chapman, Getman J. Cordero, Cary Culp, Genie Deckard and Steven DeMott.)
2/18/2014	MD	0.3	md/dg discussing edits to letter brief re kellogg's refusal to provide company email addresses 0.3
2/18/2014	AG	0.3	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Andrew Donnelly, Kris W. Ferguson, Tamsen Gaskell, Craig A. Glasscock, Allen C. Greeley, William L. Guy III, Tracey Hiles, Carolyn Heinowski, Jonathan C. Hoyle and David Loffer., # (2) Consent to Sues of Anthony Scott Mallard, Jackie McCall, John D. McDevitt, James McGuire, Misty Coral Pace, Jarrad J. Paul, Penny Nelson, Charles Pemberton, Garth A. Peter and Chad Prologo., # (3) Consent to Sues of Buffy Prouty, Scott Quiring, Edward J. Raggie, Jeffrey Ralston, Rollin J. Reading III, Joseph Rigdon, Bob Roberts, Eddy M. Sanchez, Bert Seabourn, and Sheila Simpson., # (4) Consent to Sues of Alicia Venher-Slick, Devin Stokes, Tina Venzon, Christopher S. Voss, Barry J. Wagoner, Larry G. Weathers, Clifton A. Wiggins, Michelle D. Williams, John Scott Wilson, Tracy W. Wilson, and Devin L. Zickfoose.)
2/18/2014	AG	1.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/19/2014	MD	0.3	md reviewing third amended complaint and sending to defense counsel 0.3
2/19/2014	DG	0.5	review draft 3rd amended complaint prior to sending to Kellogg for consent .5
2/19/2014	KW	0.2	respond to email from plaintiff [ ] regarding litigation process .2
2/19/2014	KW	0.6	Create spreadsheet of names and addresses of potential plaintiffs for whom Notices were returned and for which we cannot find a new address .5 email to litigation team to be used to request 4 digit SS numbers for each from defendant .1
2/19/2014	CM	0.3	KW/CM review spreadsheet for tracking reconciliation of consents filed in pacer with TM clients (.3)
2/19/2014	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/19/2014	KW	0.9	verify information in TimeMatters electronic file; edit and correct as needed for accurate record of plaintiff information
2/19/2014	JP	0.1	vm for plaintiff to call for intake

Date	Staff	Amount of Time	Description
2/19/2014	JP	0.5	jp/kw discuss issues to be resolved to move ahead on state class filings .3 discuss implementing a system to track Notices returned by mail .1 create spreadsheet to track Notices returned, address search and remailings .1
2/19/2014	KW	0.3	KW/CM review spreadsheet for tracking reconciliation of consents filed in pacer with TM clients (.3)
2/19/2014	KW	0.5	jp/kw discuss issues to be resolved to move ahead on state class filings .3 discuss implementing a system to track Notices returned by mail .1 create spreadsheet to track Notices returned, address search and remailings .1
2/19/2014	CLER	0.2	Data Entry of contact information of clients
2/19/2014	CLER	1.5	Data Entry of contact information of clients
2/19/2014	CM	0.8	cross-check pacer with TM client records (.8)
2/19/2014	JP	0.5	fact finding intake
2/19/2014	JP	0.3	fact finding intake and state class rep search
2/19/2014	MR	0.4	review Def ESI arguments countering my declaration .2, reply email to attys about same .2
2/19/2014	AG	0.2	ECF filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Louis Reeise, Brian J. Stewart and Juan O. Vidaurri.)
2/19/2014	MD	0.1	dg/md discuss issues of naming state classes in 3rd amended complaint .1
2/19/2014	JP	0.7	fact finding intake and disclussion of being a state class rep
2/19/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#188 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Andrew Donnelly, Kris W. Ferguson, Tamsen Gaskell, Craig A. Glasscock, Allen C. Greeley, William L. Guy III, Tracey Hiles, Carolyn Heinowski, Jonathan C. Hoyle and David Loffer., # (2) Consent to Sues of Anthony Scott Mallard, Jackie McCall, John D. McDevitt, James McGuire, Misty Coral Pace, Jarrad J. Paul, Penny Nelson, Charles Pemberton, Garth A. Peter and Chad Prologo., # (3) Consent to Sues of Buffy Prouty, Scott Quiring, Edward J. Raggie, Jeffrey Ralston, Rollin J. Reading III, Joseph Rigdon, Bob Roberts, Eddy M. Sanchez, Bert Seabourn, and Sheila Simpson., # (4) Consent to Sues of Alicia Venher-Slick, Devin Stokes, Tina Venzon, Christopher S. Voss, Barry J. Wagoner, Larry G. Weathers, Clifton A. Wiggins, Michelle D. Williams, John Scott Wilson, Tracy W. Wilson, and Devin L. Zickfoose.)(Dunn, Matt)
2/19/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#187 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of James J. Arre, Angela Borgstedt, Ronald Brown, Kelly A. Embert, Raul Galvan, Kurt A. Harris,Jr., Kenneth E. Hoak, Christopher W. King, Randy Kuchenbecker and Adam MacDormand., # (2) Consent to Sues of Dean R. Moran Jr., Gregory J. Oyster, Marcus Perez, Michael F. Phillips, Thomas H. Priaulx, Richard Robertson, Anthony J. Rosa, Amy L. Rutmann, Richard Stutes and Richard M. Volk., # (3) Consent to Sues of Christopher Adams, Wesley T. Berry Jr., Travis Boyer, Vicki A. Brzozowski, Clare Buhrandt, Bryan L. Chapman, Getman J. Cordero, Cary Culp, Genie Deckard and Steven DeMott.)(Dunn, Matt)
2/19/2014	JP	1.4	reviewed list provided by Kellogg for state class claims, summarized and email to team to determine how to proceed going forward in search for state class reps
2/19/2014	DG	0.5	research classability of claims under IN, NC, VA, GA, law .5
2/19/2014	DG	0.1	dg/md discuss issues of naming state classes in 3rd amended complaint .1
2/19/2014	JP	0.1	message for client to call for intake

Date	Staff	Amount of Time	Description
2/19/2014	JP	0.2	email response to retaliaton concerns
2/19/2014	JP	0.1	vm for plt to call for intake
			Respond to email from plaintiff regarding corrected mailing address .1 verify mailing
2/19/2014	KW	0.2	address in electronic case files .1
2/19/2014	MD	0.1	md email defense counsel about filing letter and exhibits 0.1
2/19/2014	JP	0.5	fact finding intake
2/19/2014	DG	0.1	md/dg discussing defense counsel's edits to letter brief 0.1
2/19/2014	MD	0.1	md/dg discussing defense counsel's edits to letter brief 0.1
2/19/2014	MD	0.2	md review defense counsel's edits to letter 0.2
2/20/2014	JP	0.1	vm for intake in response to his voice message
2/20/2014	JP	0.2	update state wage and hour law spreadsheet for state class rep searched
2/20/2014	MD	1.5	md researching state law to bring state overtime class action claims 1.5
2/20/2014	JP	0.7	review notes for potential state class reps
			recieved blank fax with [name] - googled searched for phone number and called and left
2/20/2014	JP	0.2	message that the CTS did not fax
			Fact finding intake and discused being state class rep .5; create and email state class
2/20/2014	JP	0.7	retainer .2
			md review email from defense counsel about telephone numbers and email addresses
2/20/2014	MD	0.1	0.1
2/20/2014	JP	0.2	create and email state class rep. retainer
2/20/2014	DG	0.2	md/dg/jp discussing bringing nationwide contract class action 0.2
2/20/2014	JP	0.2	fact finding intake & search for state class rep.
2/20/2014	MD	0.2	md/dg/jp discussing bringing nationwide contract class action 0.2
2/20/2014	JP	0.2	md/dg/jp discussing bringing nationwide contract class action 0.2
2/20/2014	JP	0.4	fact finding intake and questions about the lawsuit
2/20/2014	JP	0.3	fact finding intake
			md/dg discussing bringing nationwide class action and state that have overtime causes of
2/20/2014	MD	0.6	action for additional class actions 0.6
2/20/2014	JP	0.1	called, voice message for intake
2/20/2014	JS	0.1	tc for jp, sent to vm (jp unavail, on another line)
			md/dg discussing bringing nationwide class action and state that have overtime causes of
2/20/2014	DG	1.6	action for additional class actions 0.6; legal research on state contract claim 1
2/20/2014	JP	0.3	fact finding intake
2/20/2014	JP	0.1	call from plaintiff to say he could not participate in intake process at this time.
2/20/2014	JP	0.2	fact finding intake
2/20/2014	JP	0.2	review documents and intake to determine if possible state class rep .1; leave vm .1
2/20/2014	MD	0.5	md researching state class action overtime laws 0.5
2/20/2014	JS	0.1	forward fb msg from [ ] to JP, KW
2/21/2014	CM	3.2	reconciliation of consents to sue filed in pacer with TM client records (3.2)
2/21/2014	MD	0.1	md email dg about md call w/ defense counsel 0.1
2/21/2014	MD	0.3	md speak w/ defense counsel about joint status report and amended complaint 0.3
2/21/2014	JP	0.6	fact finding intake and discussion of retaliation concerns
2/21/2014	MD	0.5	md review documents for nationwide contract class action claim 0.5
2/21/2014	MD	0.1	md reviewing joint status report 0.1
			md preparing motion to amend the complaint, including editing motion, editing memo,
2/21/2014	MD	2.5	preparing amended complaint 2.5
2/24/2014	MD	0.1	md email defense counsel about joint discovery plan 0.1

Date	Staff	Amount of Time	Description
2/24/2014	MR	0.4	review prior Kellogg work on declaration .2; file organization with regard to that work .2
2/24/2014	KW	0.1	KW/CM discuss status of consent to sue cross-checking (.1)
2/24/2014	JP	0.3	call from anomomous district manager asking if he was eligible for the lawsuit
2/24/2014	CLER	1.5	enter information for new plaintiffs into electronic system
2/24/2014	CM	0.1	KW/CM discuss status of consent to sue cross-checking (.1)
2/24/2014	MR	0.8	MR/CM review methods of extracting docket information from PACER and cross-checking with client records in TM (.8)
2/24/2014	JS	0.1	call for JP, took msg sent eml
2/24/2014	JP	0.3	fact finding intake
2/24/2014	CM	0.8	MR/CM review methods of extracting docket information from PACER and cross-checking with client records in TM (.8)
2/24/2014	JP	0.5	fact finding intake
2/24/2014	KW	0.4	begin to process new consents received for filing .4
2/24/2014	JS	0.1	returning a GS call (JP or KW?)
2/24/2014	CLER	1.6	enter information for new plaintiffs into electronic system
2/24/2014	MD	0.5	md listening to kellogg analysts discuss sales 0.5
2/24/2014	MD	2.5	md researching outside sales exemption and historical cases, including Federal Reporter comments on exemption 2
2/25/2014	KW	0.1	mr/kw review information about estimated cost of printing and mailing 2000 reminder postcards .1
2/25/2014	JP	0.6	fact finding intake and answered questions about lawsuit
2/25/2014	MD	0.7	md researching WI state law for OT class action 0.7
2/25/2014	KW	0.1	jp/kw discussion of filing CTS of putative class member who was on the mailing list but may be outside SOL
2/25/2014	MR	0.2	mr/kw plan work needed to accomplish mailing of reminder postcard on March 4, 2014
2/25/2014	JP	0.3	fact finding intake
2/25/2014	JP	0.3	research CRS gps system used by defendants.
2/25/2014	JP	0.1	jp/kw discussion of filing CTS of putative class member who was on the mailing list but may be outside SOL
2/25/2014	KW	2.1	enter plaintiff information into electronic file for each new opt-in 2.1
2/25/2014	MD	0.2	md/kw discussion of follow-up needed to search social security numbers and phone numbers for undeliverables discussion of mechanics of mailing post card reminder
2/25/2014	MD	0.2	md/dg discussing joint discovery plan and filing of the amended complaint to bring additional state claims 0.2
2/25/2014	KW	0.5	go to PDG Printers to discuss job of printing and mailing approximetely 2000 reminder post cards and get estimate of cost- .5
2/25/2014	KW	CLER	scan 41 new signed consents to sue .4 label and name to prepare for ECF filing .4 update electronic file .1
2/25/2014	KW	0.2	md/kw discussion of follow-up needed to search social security numbers and phone numbers for undeliverables discussion of mechanics of mailing post card reminder
2/25/2014	DG	0.4	md/dg discussing joint discovery plan and filing of the amended complaint to bring additional state claims 0.2; legal research on WI state law re prevailing party fees .2
2/25/2014	JP	0.2	fact finding intake
2/25/2014	JS	0.1	tc returning JP call
2/25/2014	JP	0.5	fact finding intake

Date	Staff	Amount of Time	Description
2/25/2014	JP	0.7	fact finding intake
2/25/2014	KW	0.2	mr/kw plan work needed to accomplish mailing of reminder postcard on March 4, 2014
2/25/2014	JP	0.7	fact finding intake and discussion about being a state class rep
2/25/2014	MD	0.7	md researching outside sales exemption and dol regs, and dol field handbook 0.7
2/25/2014	MD	0.5	md researching cases where employer recovered attorneys fees 0.5
2/25/2014	MD	0.5	md researching Kellogg's DSD system 0.5
2/25/2014	MD	0.1	md call to defense counsel 0.1
2/25/2014	JP	0.7	fact finding intake
2/25/2014	MD	0.1	md call to defense counsel about joint discovery plan and tolling sol for amended complaint 0.1
2/25/2014	MR	0.1	mr/kw review information about estimated cost of printing and mailing 2000 reminder postcards .1
2/25/2014	JP	0.7	fact finding intake
2/26/2014	KW	0.1	KW/CM discuss question re scanning of original consent to sue forms (.1)
2/26/2014	MR	0.2	create new TM client list for address matchup
2/26/2014	JS	0.1	tc re: concerns re: retaliation
2/26/2014	KW	0.2	mr/kw review corrected address list discuss and decide on efficient process to develop correct mailing list for those potential class members who need a post card reminder
2/26/2014	MD	0.2	MD/AG discussion on mailing of postcards
2/26/2014	KW	0.1	email information about plaitniff [ ] availability to J. Pickering to pursue as possible state class rep.1
2/26/2014	CM	0.1	KW/CM discuss question re scanning of original consent to sue forms (.1)
2/26/2014	MR	4.3	create notice list work files and transfer to lab computer .1, gather and review prior matchup work files used .2, send email to para/atty asking about follow-up in previously generated "missing" lists .2, redo Time Matters contact list "pull" from database .3, transfer TM list to lab computer .1, parse TM list into separate client, intake and class lists .3, examine TM list for errors .4, send several emails to para KW about problematic data (in zip codes, contact codes and other fields) in TM client data .3, initial comparison of master mailing list to Def 1-31-14 notice list .2, investigate omissions on master mailing list by performing match-up to client list and using lookup matchup and fuzzy logic
2/26/2014	KW	0.2	matchup 1.1; isolate truncations and other errors in master mailing list .2, md/ag/kw discuss processing and data needed to process mailing of 2000 reminder postcards
2/26/2014	AG	0.2	MD/AG discussion on mailing of postcards
2/26/2014	AG	0.2	md/ag/mr/kw determine and assign tasks and timeframe ot accomplish mailing of reminder postcards
2/26/2014	MR	0.2	md/ag/mr/kw determine and assign tasks and timeframe ot accomplish mailing of reminder postcards
2/26/2014	MD	0.2	md/ag/mr/kw determine and assign tasks and timeframe ot accomplish mailing of reminder postcards
2/26/2014	KW	0.2	respond to named plaintiff's email requesting a case update .1 add information to case notes .1



Date	Staff	Amount of Time	Description
2/26/2014	AG	0.3	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Rodger Lecocq, John J. Keech III, Codi Loper, Eldon Lytle, Mike McDaid, Jean Mienders, Michael J. OConnor, Heather Parker, John D. Pavlik and Gary L. Qualls., # (2) Consent to Sue of Anton P. Raterman, Chad A. Ritter, Luther G. Scarlett, Sandra Schnetter, Edward Schwartz, William B. Sigler, Mark Slager, Daniel A. Snyder, Matthew Steege, Ronald Stigger and Kelly J. Story., # (3) Consent to Sue of Gregory Talbot, Scott Tubo, Leslie Turpening, Karen Wagner, Steven Ray Warden, Sam Villanueva, Eddie A. Weaver, Greg Klueber, Stephen P. Wehner and Ryan Williams.)
2/26/2014	MR	0.2	mr/kw review corrected address list discuss and decide on efficient process to develop correct mailing list for those potential class members who need a post card reminder
2/26/2014	KW	0.2	md/ag/mr/kw determine and assign tasks and timeframe to accomplish mailing of reminder postcards
2/26/2014	KW	0.2	reach out to putative class member who had concerns about retaliation .1 add information to case notes .1
2/26/2014	MD	0.1	md/dg discussing topics for strategy meeting 0.1
2/26/2014	KW	0.3	telephone call from plaintiff [ ] regarding her term of employment, place of employment and taxes paid while employed at Kellogg .2 add information to case notes .1
2/26/2014	KW	0.3	respond to questions posed by putative class member who is concerned about possible retaliation .3
2/26/2014	KW	0.3	mr/kw-review electronic data system- discussion of how to efficiently track dates of employment and states of employment of opt-ins
2/26/2014	KW	0.3	respond to concerns of putative class member about impact of joining on his severance agreement .2 open case contact .1
2/26/2014	MD	0.3	md editing motion to amend the complaint 0.3
2/26/2014	MR	0.5	examine prior work done in matching up clients and intakes to Kellogg mailing list .4; get current number of clients in TM database .1
2/26/2014	MR	0.1	mr/kw review mailing list and corrected mailing list to create data in format needed for names match to eliminate duplication of mailings
2/26/2014	DG	0.1	md/dg discussing topics for strategy meeting 0.1
2/26/2014	AG	0.2	ag/kw discussion of costs and logistics of mailing 2000 reminder post cards to potential class members
2/26/2014	AG	1.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
2/26/2014	KW	0.2	ag/kw discussion of costs and logistics of mailing 2000 reminder post cards to potential class members
2/26/2014	AG	0.3	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Carla Alvarado, James D. Anderson, Susan H. Besozzi, Wendy Blalock, Kevin Bridges, Mike Carns, Roger D. Carroll, Juan I. Cavazos, David Cole and Pauls Cortes., # (2) Consent to Sues of Russell W. Culpepper, Peggy Davis, Tommy Davis, Robin Echerd, Melaine Feldman, Michael Feldman, Timothy T. Finch, Alfredo Flores, David F. Updyke Jr. and Thomas K. Gabbie., # (3) Consent to Sues of Keith P. Graaff, William Guffgy, Jim Harris, Chad Heeter, Jennifer Hie, James Hough, Mark Howell, William Irizarry, Stephanie A. Johnson and Susan Lanham.)
2/26/2014	KW	0.2	update electronic file to reflect complete record of discovery documents and correspondence .2
2/26/2014	AG	0.3	conduct address verification of RTS mailing (Notices)

Date	Staff	Amount of Time	Description
2/26/2014	KW	0.1	mr/kw review mailing list and corrected mailing list to create data in format needed for names match to eliminate duplication of mailings
2/26/2014	MR	0.3	mr/kw-review electronic data system- discussion of how to efficiently track dates of employment and states of employment of opt-ins
2/26/2014	KW	1.2	reuiw all notices returned by the Post Office with a new address and create spreadsheet of names, addresses and line number from original mailing list to the new spreadsheet for remailing processing 1.2
2/27/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#190 - Letter from Defendants & Plaintiffs to Judge Leighton with Attachments. (Nelson, James)
2/27/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#193 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Tommy Anthony, Larry O. Cole, Tiffany L. Gatto, Robert J. Goettel, Raymond E. Grant Jr., Matthew Gregory, Susan Hart, Joseph J. Jankiewicz Jr., Dana K. Lee and Felicia Kornegay., # (2) Consent to Sues of Edward McLaughlin, Michael Onorato, Heather Pellegrino, Jeri L. Rivard, Stanley Scherer, Adam Schiff, Gregory R. Scott, Stephen Ray Simmons, Alan Slack and Brain Suddoth.)(Dunn, Matt)
2/27/2014	DG	0.1	md/dg discussing email to defense counsel re meeting with opt-in plaintiffs 0.1
2/27/2014	CLER	0.6	Data Entry of contact information of clients
2/27/2014	AG	0.7	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Tommy Anthony, Larry O. Cole, Tiffany L. Gatto, Robert J. Goettel, Raymond E. Grant Jr., Matthew Gregory, Susan Hart, Joseph J. Jankiewicz Jr., Dana K. Lee and Felicia Kornegay., # (2) Consent to Sues of Edward McLaughlin, Michael Onorato, Heather Pellegrino, Jeri L. Rivard, Stanley Scherer, Adam Schiff, Gregory R. Scott, Stephen Ray Simmons, Alan Slack and Brain Suddoth.)
2/27/2014	AG	0.2	conduct address verification of RTS mailing (Notices)
2/27/2014	AG	0.7	dg/md/kw discuss information regarding mandatory meeting between opt-ins and Kellogg legal department and out response .3
2/27/2014	DG	0.3	research files for consent to sue of [ ] .2
2/27/2014	KW	0.2	dg/md/kw discuss information regarding mandatory meeting between opt-ins and Kellogg legal department and out response .3
2/27/2014	MD	0.3	mr/kw resolve data glitches in mailing list to facilitate mailing of reminder post cards .4
2/27/2014	KW	0.4	mr/kw resolve data glitches in mailing list to facilitate mailing of reminder post cards .4
2/27/2014	MR	0.4	email KW question about corrected postal address that could apply to one of two people in mailing list
2/27/2014	MR	0.1	

Date	Staff	Amount of Time	Description
2/27/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#192 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Rodger Lecocq, John J. Keech III, Codi Loper, Eldon Lytle, Mike McDaid, Jean Mienders, Michael J. OConnor, Heather Parker, John D. Pavlik and Gary L. Qualls., # (2) Consent to Sue of Anton P. Raterman, Chad A. Ritter, Luther G. Scarlett, Sandra Schnetter, Edward Schwartz, William B. Sigler, Mark Slager, Daniel A. Snyder, Matthew Steege, Ronald Stigger and Kelly J. Story., # (3) Consent to Sue of Gregory Talbot, Scott Tubo, Leslie Turpening, Karen Wagner, Steven Ray Warden, Sam Villanueva, Eddie A. Weaver, Greg Klueber, Stephen P. Wehner and Ryan Williams.)(Dunn, Matt)
2/27/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#191 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sues of Carla Alvarado, James D. Anderson, Susan H. Besozzi, Wendy Blalock, Kevin Bridges, Mike Carns, Roger D. Carroll, Juan I. Cavazos, David Cole and Pauls Cortes., # (2) Consent to Sues of Russell W. Culpepper, Peggy Davis, Tommy Davis, Robin Echerd, Melaine Feldman, Michael Feldman, Timothy T. Finch, Alfredo Flores, David F. Updyke Jr. and Thomas K. Gabbie., # (3) Consent to Sues of Keith P. Graaff, William Guffgy, Jim Harris, Chad Heeter, Jennifer Hie, James Hough, Mark Howell, William Irizarry, Stephanie A. Johnson and Susan Lanham.)(Dunn, Matt)
2/27/2014	CLER	0.1	create PDF format of document recd from client
2/27/2014	DG	0.2	md/dg discussing edits to settlement agreement and process for dealing with defendants' non-production of information 0.2
2/27/2014	MD	0.3	md speak with opt-in re scheduled meeting by kellogg's legal department regarding case 0.3
2/27/2014	KW	0.2	md/kw discussing process for completing list of names for issuing reminder notice 0.2
2/27/2014	MD	0.2	md/kw discussing process for completing list of names for issuing reminder notice 0.2
2/27/2014	MR	1.4	continue work with matchup of Def 1-31-14 notice list with current client list and USPS corrected address list
2/27/2014	MD	0.2	md call opt-in regarding resolution of conference call with Kellogg's inhouse legal counsel 0.2
2/27/2014	JP	1.1	dg/md/jp/mr/kw litigation team meeting to discuss litigation progress, the notice to opt-ins of a mandatory meeting with legal department; discovery plan and Joint Discovery conference
2/27/2014	DG	1.1	dg/md/jp/mr/kw litigation team meeting to discuss litigation progress, the notice to opt-ins of a mandatory meeting with legal department; discovery plan and Joint Discovery conference
2/27/2014	MD	0.2	md/dg discussing md call with opt-in re meeting set up by legal department and potential for coercion by Kellogg to reduce opt-in participation
2/27/2014	KW	0.2	telephone call from [ ], plaintiff, regarding notice of mandatory meeting with legal department for opt-ins- .1 add information to case notes .1
2/27/2014	MD	1.1	dg/md/jp/mr/kw litigation team meeting to discuss litigation progress, the notice to opt-ins of a mandatory meeting with legal department; discovery plan and Joint Discovery conference
2/27/2014	MR	1.1	dg/md/jp/mr/kw litigation team meeting to discuss litigation progress, the notice to opt-ins of a mandatory meeting with legal department; discovery plan and Joint Discovery conference

Date	Staff	Amount of Time	Description
2/27/2014	MD	0.1	md/dg discussing response email to defense counsel re meeting with opt-in plaintiffs 0.1
2/27/2014	MR	0.6	create list of truncations in notice mailing list .3;email to Kathy about issues with notice mailing list, including truncation list .2; followup email to mgmt team about truncation issues .1
2/27/2014	KW	0.3	dg/md/kw discuss information regarding mandatory meeting between opt-ins and Kellogg legal department and out response .3
2/27/2014	KW	0.3	update spreadsheet for mailing of reminder postcards .3
2/27/2014	DG	0.4	md/dg discussing response email to defense counsel re meeting with opt-in plaintiffs 0.1; emails to/from Boudreau re same .3
2/27/2014	MD	0.1	md/dg discussing email to defense counsel re meeting with opt-in plaintiffs 0.1
2/27/2014	DG	0.2	draft email to def re impermissible mtgs with opt-ins .2
2/27/2014	DG	0.2	md/dg discussing md call with opt-in re meeting set up by legal department and potential for coercion by Kellogg to reduce opt-in participation
2/27/2014	MD	0.5	md researching outside sales exemption cases 0.5
2/27/2014	DG	0.1	md/dg discussing response email to defense counsel re meeting with opt-in plaintiffs 0.1
2/27/2014	KW	1.1	dg/md/jp/mr/kw litigation team meeting to discuss litigation progress, the notice to opt-ins of a mandatory meeting with legal department; discovery plan and Joint Discovery conference
2/28/2014	CM	0.2	follow up on errors found in pacer/TM cross-checking (.2)
2/28/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Annie Brooks, L. Allen Carter, William Davis, John F. Fabanish, Timothy Golden, Nathan Lane, Walter Neal, Phyllisa Pearson, Michael Pritchett, Shanendooh Spier, Larry W. Tasker, Mark D. Van Horn and Alberto Vela.)
2/28/2014	MD	0.1	md review request to opt-out 0.1
2/28/2014	MA	0.1	call from client [ ] to discuss russell stover lawsuit
2/28/2014	JS	0.1	call returning JP call
2/28/2014	MD	0.2	md review and edit proposed notice of opt-out 0.2
2/28/2014	MR	0.1	MR/JS discuss workaround for mail merge
2/28/2014	JP	0.5	fact finding intake on job for TM in CA
2/28/2014	AG	0.8	conduct address verification of RTS mailing (Notices)
2/28/2014	JP	2.3	research and write email summary of issues with CA TMs
2/28/2014	JS	0.1	MR/JS discuss workaround for mail merge
2/28/2014	JS	0.1	call about Kellogg lawsuit
2/28/2014	JP	0.3	dg/jp discuss facts concerning def's CA class list being shortchanged .2; prepare email to JB re same .1
2/28/2014	DG	0.3	dg/jp discuss facts concerning def's CA class list being shortchanged .2; prepare email to JB re same .1
2/28/2014	DG	0.1	md/dg discussing response to client re request to opt-out 0.1
2/28/2014	MD	2.5	md researching and adding WI state law overtime and unpaid wage claim to amended complaint 2.5
2/28/2014	JP	0.1	message to call for intake
2/28/2014	AG	0.2	prepare Notice of Filing of Withdraw of Consents to Sue and ltr of withdrawal for filing
2/28/2014	MD	0.1	md/dg discussing response to client re request to opt-out 0.1
2/28/2014	MD	0.3	md call with client regarding request to opt-out 0.3
2/28/2014	AG	0.8	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing

Date	Staff	Amount of Time	Description
2/28/2014	CLER	0.4	Data Entry of contact information of clients
			ECF Filing of NOTICE of Filing of Withdrawal of Consent to Sue (Attachments: # (1) Brian J.
2/28/2014	AG	0.2	Stewart Withdrawal)(
2/28/2014	MD	0.3	md coordinating with AG/MR/JP about issuing postcard reminder 0.3
			mr/ kw update regarding processing mailing of 2000 reminder postcards determine
3/3/2014	KW	0.2	work still needing attention .2
			Transfer documents recd from ECF system to docket file and create file copy(Docket#189 -
			NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
3/3/2014	CLER	0.1	Consent to Sues of Louis Reeise, Brian J. Stewart and Juan O. Vidaurri.)(Dunn, Matt)
3/3/2014	JP	0.5	fact finding intake
3/3/2014	KW	0.2	run class list to determine current number of opt-ins .1 email to lead attorney .1
3/3/2014	CLER	0.5	Data Entry of contact information of clients
3/3/2014	MD	0.5	md reviewing and editing amended complaint in regards to WI class claims 0.5
			jp/kw verify list of putative class members who have contacted our office but who are
			not on the class mailing list produced by defendant-check list against Class mailing list-
3/3/2014	KW	0.9	identify 35 names not included on the class list .9
3/3/2014	AG	0.6	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
			Transfer documents recd from ECF system to docket file and create file copy(Docket#194 -
			NOTICE of Filing of Withdrawal of Consent to Sue ; filed by Plaintiff Patty Thomas.
3/3/2014	CLER	0.1	(Attachments: # (1) Brian J. Stewart Withdrawal)(Dunn, Matt)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#195 -
			NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
			Consent to Sues of Annie Brooks, L. Allen Carter, William Davis, John F. Fabanish, Timothy
			Golden, Nathan Lane, Walter Neal, Phyllisa Pearson, Michael Pritchett, Shanendooh
3/3/2014	CLER	0.1	Spier, Larry W. Tasker, Mark D. Van Horn and Alberto Vela.)(Dunn, Matt)
3/3/2014	MD	0.1	md emailing defense counsel about return to sender notices 0.1
3/3/2014	MD	0.1	md email defense counsel about amending complaint 0.1
			jp/kw verify list of putative class members who have contacted our office but who are
			not on the class mailing list produced by defendant-check list against Class mailing list-
3/3/2014	JP	0.9	identify 35 names not included on the class list .9
			Transfer documents recd from ECF system to docket file and create file copy(Docket#196 -
			NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
			Consent to Sues of Jerrod W. Blake, Mike J. Boschsler, Garrett Cole Brashear, Staci Davis
			Chesser, Robert L. Conger, Courtland Coons, Andrew F. Dalton, Trey Danzey, Jerome
			Diakow and Donna Doan., # (2) Consent to Sues of Robert A. Dudley, Ruth J. Dye, Mark
			Elston, Lisa A. Fahlman, John C. Galloway, Zenaida Garcia, Scott Gard, Romeo Hesano,
			Adam S. Hill, Jonathan Jenkins and Deborah Keen., # (3) Consent to Sues of Jeffrey J.
			Kelly, Eric T. Kennedy, Guy Kerstetter, Bobby Ray Key, Thomas J. Korgie, Nick Kuvakos,
			Melanie Lewis, Rommel P. Manalo, Julie M. Mayhew, Richard McFaddin and Ronald E.
			McLeod., # (4) Consent to Sues of Larry Nebel, Ramon Ress, Randall Scott, Thomas E.
			Scott, Jennifer Steinmetz, William P. Thacker, Samantha Tudtud, Fred B. Thompson,
3/3/2014	CLER	0.3	Richard L. Torlone, Jennifer Weiss and Melissa L. Vider.)(Dunn, Matt)

Date	Staff	Amount of Time	Description
3/3/2014	AG	0.3	ECF filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sues of Jerrod W. Blake, Mike J. Boschler, Garrett Cole Brashear, Staci Davis Chesser, Robert L. Conger, Courtland Coons, Andrew F. Dalton, Trey Danzey, Jerome Diakow and Donna Doan., # (2) Consent to Sues of Robert A. Dudley, Ruth J. Dye, Mark Elston, Lisa A. Fahlman, John C. Galloway, Zenaida Garcia, Scott Gard, Romeo Hesano, Adam S. Hill, Jonathan Jenkins and Deborah Keen., # (3) Consent to Sues of Jeffrey J. Kelly, Eric T. Kennedy, Guy Kerstetter, Bobby Ray Key, Thomas J. Korgie, Nick Kuvakos, Melanie Lewis, Rommel P. Manalo, Julie M. Mayhew, Richard McFaddin and Ronald E. McLeod., # (4) Consent to Sues of Larry Nebel, Ramon Ress, Randall Scott, Thomas E. Scott, Jennifer Steinmetz, William P. Thacker, Samantha Tudtud, Fred B. Thompson, Richard L. Torlone, Jennifer Weiss and Melissa L. Vider.)
3/3/2014	KW	0.5	review all the returned envelopes to determine which names and addresses need to be forwarded to defendant for provision of SS# to enable address search .3 prepare spreadsheet for defendant indicating names and addresses of returns that could not be forwarded and need more additional search .2
3/3/2014	KW	0.2	verify case contact information in electronic file for recent opt-in plaintiffs
3/3/2014	MD	0.4	md updating initial disclosures 0.4
3/3/2014	MD	0.1	md call defense counsel about meeting re discovery plan 0.1
3/3/2014	KW	0.1	md/kw discussing review of amended complaint to bring WI class claims 0.1
3/3/2014	JP	0.1	md/jp discussing amended complaint regarding WI class claims 0.1
3/3/2014	MD	0.1	md/kw discussing review of amended complaint to bring WI class claims 0.1
3/3/2014	JP	0.4	fact finding intake
3/3/2014	JP	0.5	fact finding intake and answered questions about lawsuit
3/3/2014	MD	0.1	md/jp discussing amended complaint regarding WI class claims 0.1
3/3/2014	CLER	0.6	prepare welcome ltr to new clients
3/3/2014	CLER	1.1	Data Entry of contact information of clients
3/3/2014	AG	0.1	ag.kw discuss resolving issues of updated mailing list for reminder postcards .1
3/3/2014	MR	0.2	mr/ kw update regarding processing mailing of 2000 reminder postcards determine work still needing attention .2
3/3/2014	KW	0.1	ag.kw discuss resolving issues of updated mailing list for reminder postcards .1
3/4/2014	KW	0.1	update electronic file to include individual identifier number .1
3/4/2014	KW	0.1	correct electronic file to add Individual identifier number
3/4/2014	JP	0.5	voice messages to plaintiffs who might be state class reps in PA and CO
3/4/2014	KW	0.1	correct electronic file to add Individual identifier number
3/4/2014	JP	0.4	summarize facts of CA employee for attorneys to help determine if he can join the case
3/4/2014	JP	0.1	vm for intake
3/4/2014	KW	0.4	got oPDQ copy store to pick up 2000 printed post cards for mailing of reminder notice .4
3/4/2014	JP	0.1	vm for intake
3/4/2014	CLER	2.1	prepare welcome ltr to new clients
3/4/2014	KW	0.2	search files for client documents to be returned at her request .2
3/4/2014	JP	0.6	fact finding intake
3/4/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/4/2014	MD	0.1	md email local counsel about suggestions to contact J. Leighton regarding decision on emailing notice 0.1
3/4/2014	KW	0.1	forward emails with consents to A. Garcia for filing .1
3/4/2014	JP	0.1	vm for intake



Date	Staff	Amount of Time	Description
3/4/2014	MD	0.2	md/dg discussing discovery plan, motion to amend the complaint, and contacting court regarding email notice 0.2
3/4/2014	KW	0.3	respond to email requesting consent form .2 open case contact .1
3/4/2014	CLER	0.6	Data Entry of contact information of clients
3/4/2014	CLER	0.5	create PDF format of originals CTSS
3/4/2014	MD	1.5	md editing intial disclosures, including researching case law for discovery/damages on a representative sample basis to include in initial disclosures 1.5
3/4/2014	DG	0.7	md/dg discussing discovery plan, motion to amend the complaint, and contacting court regarding email notice 0.2; review brief to amend .2; edit motion and order to amend 3rd amended cplt .2; email to MD re same .1
3/4/2014	CLER	0.9	prepare welcome ltr to new clients
3/4/2014	MD	0.2	md editing motion to amend complaint 0.2
3/4/2014	KW	1.1	process mailing of 2000 postcard reminders through postage machine
3/4/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#197 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Tina Caldwell, Thomas C. Fisher, Rocco Giunta, Kenny Hadel, David Olsen, Doran Randall, Dennis J. Rieder and George F. Whitaker.)(Dunn, Matt)
3/4/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Tina Caldwell, Thomas C. Fisher, Rocco Giunta, Kenny Hadel, David Olsen, Doran Randall, Dennis J. Rieder and George F. Whitaker.)
3/4/2014	JP	0.5	fact finding intake
3/5/2014	KW	0.2	jp/kw discuss follow-up to defendant's scheduling meeting between new opt-ins and legal department
3/5/2014	AG	0.2	ECF Filing of MEMORANDUM re [199] Unopposed MOTION to Amend [142] Amended Complaint,, (Attachments: # (1) Exhibit 1 3rd Amended Complaint, # (2) Exhibit 2 3rd Amended Complaint, # (3) Proposed Order)
3/5/2014	AG	0.2	MD/AG discussion on correcting Exhibit of D's Deposition (reporter send disk with one sided of documents containing only odd number pages)
3/5/2014	CLER	1.3	prepare welcome ltr to new clients
3/5/2014	MD	0.2	MD/AG discussion on correcting Exhibit of D's Deposition (reporter send disk with one sided of documents containing only odd number pages)
3/5/2014	CLER	0.3	Data Entry of contact information of clients
3/5/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/5/2014	CLER	0.3	prepare welcome ltr to new clients
3/5/2014	AG	0.1	ECF Filing of Unopposed MOTION to Amend [142] Amended Complaint, Noting Date 3/21/2014.
3/5/2014	MD	0.2	md/jp discussing documents produced by client re hours worked 0.2
3/5/2014	JP	0.2	md/jp discussing documents produced by client re hours worked 0.2
3/5/2014	CM	0.1	AG/CM discuss issues in keeping track of consents to sue (.1)
3/5/2014	KW	0.3	respond to email from new opt-in re filing consent to sue .1 open case contact .1 add case information .1
3/5/2014	KW	0.5	research files for exhibits used in 30(b)(6) deposition of Linds Bussell .3 scan exhibits .1
3/5/2014	MD	0.2	md/ag discussing missing pages to exhibits from deposition 0.2
3/5/2014	AG	0.1	AG/CM discuss issues in keeping track of consents to sue (.1)

Date	Staff	Amount of Time	Description
3/5/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(#198 - NOTICE of Filing of Cosent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Scott Andryauskas, Bonnie D. Crawford-Cook and Richard Kellam.)(Dunn, Matt)
3/5/2014	MD	0.1	md email defense counsel about filing amended complaint 0.1
3/5/2014	AG	0.2	md/ag discussing missing pages to exhibits from deposition 0.2
3/5/2014	AG	0.2	ECF Filing of NOTICE of Filing of Cosent to Sues (Attachments: # (1) Consent to Sue of Scott Andryauskas, Bonnie D. Crawford-Cook and Richard Kellam.)
3/5/2014	MD	0.5	md review and prepare motion to amend complaint for filing 0.5
3/5/2014	MD	0.1	md review court order re company email addresses 0.1
3/5/2014	CLER	0.4	create PDF format of originals CTSS
3/5/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#199 - Unopposed MOTION to Amend [142] Amended Complaint,, by Plaintiff Patty Thomas. Noting Date 3/21/2014, (Getman, Dan)
3/5/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#200 - MEMORANDUM filed by Plaintiff Patty Thomas re [199] Unopposed MOTION to Amend [142] Amended Complaint,, (Attachments: # (1) Exhibit 1 3rd Amended Complaint, # (2) Exhibit 2 3rd Amended Complaint, # (3) Proposed Order)(Getman, Dan)
3/5/2014	KW	0.5	initial intake interview -concern about retaliation .4 add information to case notes .1 jp/kw discuss follow-up to defendant's scheduling meeting between new opt-ins and
3/5/2014	JP	0.2	legal department
3/6/2014	DG	0.9	md/dg conference call with defense counsel regarding joint discovery plan 0.9
3/6/2014	MD	0.4	md editing joint discovery plan 0.4
3/6/2014	MR	1.3	JLP/MR/KW/AG/CM discuss process of cross-checking consents to sue and correcting errors (1.3)
3/6/2014	KW	1.3	JLP/MR/KW/AG/CM discuss process of cross-checking consents to sue and correcting errors (1.3)
3/6/2014	CM	1.3	JLP/MR/KW/AG/CM discuss process of cross-checking consents to sue and correcting errors (1.3)
3/6/2014	AG	1.3	JLP/MR/KW/AG/CM discuss process of cross-checking consents to sue and correcting errors (1.3)
3/6/2014	JP	0.4	dg/md/jp/kw litigation team meeting to discuss TM-CA claims and data .2 discussion of how to proceed to establish claims of RSMs who do not have 80 hours a week of variable labor .2
3/6/2014	DG	0.4	dg/md/jp/kw litigation team meeting to discuss TM-CA claims and data .2 discussion of how to proceed to establish claims of RSMs who do not have 80 hours a week of variable labor .2
3/6/2014	MD	0.4	dg/md/jp/kw litigation team meeting to discuss TM-CA claims and data .2 discussion of how to proceed to establish claims of RSMs who do not have 80 hours a week of variable labor .2
3/6/2014	KW	0.4	md/jp/kw litigation team meeting to discuss TM-CA claims and data .2 discussion of how to proceed to establish claims of RSMs who do not have 80 hours a week of variable labor .2
3/6/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#201 - ORDER re [175] Parties' joint submission regarding an "impasse" over interpretation of the Court's prior Order, signed by Judge Ronald B. Leighton. (DN)

Date	Staff	Amount of Time	Description
3/6/2014	JP	0.4	md/jp/kw litigation team meeting to discuss TM-CA claims and data .2 discussion of how to proceed to establish claims of RSMs who do not have 80 hours a week of variable labor .2
3/6/2014	MD	0.4	md/jp/kw litigation team meeting to discuss TM-CA claims and data .2 discussion of how to proceed to establish claims of RSMs who do not have 80 hours a week of variable labor .2
3/6/2014	CM	0.4	follow up on correcting client records in TM (.4)
3/6/2014	MD	0.2	md/dg discussing/digesting call with defense counsel re joint discovery plan 0.2
3/6/2014	DG	0.2	md/dg discussing/digesting call with defense counsel re joint discovery plan 0.2
3/6/2014	MD	0.9	md/dg conference call with defense counsel regarding joint discovery plan 0.9
3/6/2014	AG	0.3	prepare remailing of notices with updated addresses
3/6/2014	MA	0.1	call from client [ ] to update contact information
3/6/2014	CLER	0.3	prepare welcome ltr to new clients
3/6/2014	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/6/2014	CLER	0.3	Data Entry of updated contact information of notices returned into spreadsheet
3/6/2014	CLER	0.3	Data Entry of contact information of clients
3/6/2014	CLER	1	prepare welcome ltr to new clients
3/6/2014	DG	0.2	md/dg discussing topics to cover with defense counsel for joint status report 0.2
3/6/2014	JP	0.6	fact finding intake
3/6/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Norman J. Barney, Jerry S. Honea and Wade Shauers.)
3/6/2014	MD	0.5	md preparing for 26f conference per court order 0.5
3/6/2014	MD	0.2	md/dg discussing topics to cover with defense counsel for joint status report 0.2
3/6/2014	JP	1.3	JLP/MR/KW/AG/CM discuss process of cross-checking consents to sue and correcting errors (1.3)
3/6/2014	KW	0.4	dg/md/jp/kw litigation team meeting to discuss TM-CA claims and data .2 discussion of how to proceed to establish claims of RSMs who do not have 80 hours a week of variable labor .2
3/7/2014	JP	0.1	em request for info on variable labor used when RSM
3/7/2014	JP	0.9	fact finding intake and questions about retaliation from a TM who is speaking on behalf of many other TMS
3/7/2014	DG	0.7	edit proposed scheduling order .7
3/7/2014	DG	0.2	md/dg discussing requiring summary judgment briefing before class cert briefing 0.2
3/7/2014	AG	1.1	conduct address verification of RTS mailing (Notices)
3/7/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#202 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Norman J. Barney, Jerry S. Honea and Wade Shauers.)(Dunn, Matt)
3/7/2014	AG	0.2	ECF Filing NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Robert Burns, Craig Guertin, Jeffry Horak, Katherine Howell, Thomas Moseley and Chad Napper.)
3/7/2014	JP	3.2	review information provided by clients and intakes re the RSM title to help determine if this position can be included in lawsuit

Date	Staff	Amount of Time	Description
3/7/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#203 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Robert Burns, Craig Guertin, Jeffry Horak, Katherine Howell, Thomas Moseley and Chad Napper.)(Dunn, Matt)
3/7/2014	MD	2	md drafting joint discovery plan 2
3/7/2014	CLER	0.4	Data Entry of contact information of clients
3/7/2014	CLER	1.2	prepare welcome ltr to new clients
3/7/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/7/2014	MD	0.4	md editing joint discovery plan 0.4
3/7/2014	JP	0.4	called to discuss RSM and variable labor and efforts to sue Kellogg for age discrimination and disability discrimination
3/7/2014	CLER	0.9	prepare welcome ltr to new clients
3/7/2014	MD	0.1	md email with defense counsel about meet and confer for discovery 0.1
3/7/2014	MD	0.1	md call defense counsel for meet and confer on discovery 0.1
3/7/2014	MD	0.2	md/dg discussing requiring summary judgment briefing before class cert briefing 0.2
3/7/2014	MD	0.5	md researching case law on deciding summary judgment motion before moving for class certification 0.5
3/7/2014	JP	0.1	em request for info on variable labor used when RSM
3/7/2014	JP	0.1	em request for info on variable labor used when RSM
3/10/2014	JP	0.5	fact finding intake
3/10/2014	CLER	0.9	prepare welcome ltr to new clients
3/10/2014	KW	0.4	telephone discussion of possible claims and interest in joining this case .3 email cts to putative class member
3/10/2014	MA	0.1	call from putative class member to discuss joining
3/10/2014	CLER	1.4	prepare welcome ltr to new clients
3/10/2014	MR	0.4	assist para JP and KW on how to search for keyword RSM in Contact notes
3/10/2014	CLER	0.5	Data Entry of contact information of clients
3/10/2014	DG	1.2	call with JB and Marianna re discovery meet and confer on 2nd request to produce
3/10/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#204 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael DiSanto, Duane Fauser II, Edward R. Halenda Jr., Jeremy C. Kemp, Dawn McCoy, Cheryl McGuire, Brian E. Rindt, Michael Rosales, Jerry Stacy, John Michael Stout, Jeff Tarleton, Jason Trogdon and Floyd Truby.)(Dunn, Matt)
3/10/2014	KW	0.4	respond to email requests for information from putative class members .4
3/10/2014	AG	0.2	prepare mailing to client (return of org. documents)
3/10/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Michael DiSanto, Duane Fauser II, Edward R. Halenda Jr., Jeremy C. Kemp, Dawn McCoy, Cheryl McGuire, Brian E. Rindt, Michael Rosales, Jerry Stacy, John Michael Stout, Jeff Tarleton, Jason Trogdon and Floyd Truby.)
3/10/2014	CM	1.9	check pacer list with consent forms filed (1.9)
3/10/2014	AG	0.7	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/11/2014	KW	0.4	telephone call from named plaintiff to discuss litigation and next steps .3 update case information .1
3/11/2014	KW	0.6	initial intake interview .4 open case contact .1 add information to case notes .1

Date	Staff	Amount of Time	Description
3/11/2014	MR	0.3	research nickname capability in Tme Matters database for consent to sue name tracking process
3/11/2014	CLER	0.9	prepare welcome ltr to new clients
3/11/2014	KW	0.4	telephone call from putative class member enquiring about how to join .2 email consent form to him .1 open case contact and add information .1
3/11/2014	CLER	0.5	Data Entry of contact information of clients
3/11/2014	JS	0.1	call for KW--asked for callback
3/11/2014	KW	0.3	telephone call form new opt-in with quesions about case procedures .2 update case notes .1
3/11/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#205 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Roy K. Forsht, James Hager, Richard Miller, Takayuki Nagano, Rachel Realmuto, Craig A. Stoller, Earl Thompson, Corey Wagner and Nancy Wagner.)(Dunn, Matt)
3/11/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/11/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Roy K. Forsht, James Hager, Richard Miller, Takayuki Nagano, Rachel Realmuto, Craig A. Stoller, Earl Thompson, Corey Wagner and Nancy Wagner.)(Dunn, Matt)
3/11/2014	CLER	1.1	prepare welcome ltr to new clients
3/11/2014	DG	1	draft scheduling order 1
3/11/2014	CLER	0.1	Data Entry of contact information of client
3/12/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Brian Harvey, Doug W. Justice and Joseph Riker.)
3/12/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#206 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Brian Harvey, Doug W. Justice and Joseph Riker.)(Dunn, Matt)
3/12/2014	KW	0.3	jp/kw discussion of yet another Kellogg reorganization of job duties-impacting possible claims of RSMs discussion of possible additional claims on behalf of RSMs
3/12/2014	DG	1	meet and confer re discovery disputes re second request to produce 1
3/12/2014	AG	0.3	conduct address verification of RTS mailing (Notices/Postcards)
3/12/2014	JP	0.3	jp/kw discussion of yet another Kellogg reorganization of job duties-impacting possible claims of RSMs discussion of possible additional claims on behalf of RSMs
3/12/2014	MR	0.2	email to attys/paras regarding strategies to accommodate nickname or alternative names (e.g. maiden names) with Time Matters database
3/12/2014	KW	0.4	telephone call from putative class member requesting consent to sue form be mailed to him .1 prepare mailing of cover letter and consent to sue form .2 open case contact .1
3/12/2014	CLER	0.1	Data Entry of contact information of client
3/12/2014	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/12/2014	CLER	1.5	prepare welcome ltr to new clients
3/12/2014	AG	0.2	AG/KW/CM discuss most efficient method for sending out client welcome letters (.2)
3/12/2014	KW	0.2	AG/KW/CM discuss most efficient method for sending out client welcome letters (.2)
3/12/2014	CM	0.2	AG/KW/CM discuss most efficient method for sending out client welcome letters (.2)

Date	Staff	Amount of Time	Description
3/13/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Frances A. Estevez, Mark Fluss, Lydia A. Gallegos, Marcus W. Gould, Dameon Holmes, Joseph E. Hunley Jr., Monica Mullis, Kevin A. Pompey, Tom Smircich, Kevin L. Smith, Jesus E. Varela and Casey Wallace.)
3/13/2014	JS	0.3	call about CTS form .2; send cts link via email .1
3/13/2014	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/13/2014	CLER	0.4	Data Entry of contact information of clients
3/13/2014	CLER	0.6	prepare welcome ltr to new clients
3/13/2014	JS	0.1	call re: notice letter (lost, would like another copy)
3/13/2014	AG	0.4	conduct address verification of RTS mailing (Notices/Postcards)
3/13/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#207 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Frances A. Estevez, Mark Fluss, Lydia A. Gallegos, Marcus W. Gould, Dameon Holmes, Joseph E. Hunley Jr., Monica Mullis, Kevin A. Pompey, Tom Smircich, Kevin L. Smith, Jesus E. Varela and Casey Wallace.)(Dunn, Matt)
3/14/2014	CLER	0.6	prepare welcome ltr to new clients
3/14/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Virgil W. Allen, Jesus Armenta Jr., Steven Barton, Cedric Burch, Derell Collins, William E. Gray Jr., Tony Madden, Alan L. Upchurch, Kim Volpenheim and Dana Warren.)
3/14/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#208 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Virgil W. Allen, Jesus Armenta Jr., Steven Barton, Cedric Burch, Derell Collins, William E. Gray Jr., Tony Madden, Alan L. Upchurch, Kim Volpenheim and Dana Warren.)(Dunn, Matt)
3/14/2014	MA	0.2	call from putative class member to discuss joining
3/14/2014	MA	0.2	call from putative class member to discuss joining
3/14/2014	DG	3	edit Kellogg's 2nd draft of the scheduling order 1.7; emails to Subit re same .1; edit 3rd draft of scheduling order .7; edit last draft of scheduling order .5
3/14/2014	AG	0.4	conduct address verification of RTS
3/14/2014	CLER	0.4	Data Entry of contact information of clients
3/14/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#209 - JOINT STATUS REPORT signed by all parties. (Boudreau, James)
3/17/2014	CLER	0.6	prepare welcome ltr to new clients
3/17/2014	CLER	0.5	Data Entry of contact information of clients
3/17/2014	AG	0.7	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/17/2014	CM	0.2	write up summary of issues found in pacer/TM reconciliation process that need to be corrected (.2)
3/17/2014	CM	2	reconcile pacer and TM records of opt-ins (2)
3/17/2014	CM	0.3	further follow up on documenting process of opt-outs (.3)
3/17/2014	JS	0.1	called for info, ref to KW
3/17/2014	CLER	0.6	Data Entry of contact information of clients
3/17/2014	AG	1.2	conduct address verification of RTS
3/17/2014	KW	0.4	prepare excell spreadsheet of people on Notice Mailing list -for whom we need SS#s to complete a comprehensive address search .3 email to attorney for transmission to defendant .1
3/17/2014	CLER	0.5	prepare welcome ltr to new clients



Date	Staff	Amount of Time	Description
3/17/2014	KW	0.6	initial intake call from putative class member asking questions about the claims and the litigation process .4 open case contact .1 email consent to sue form and link to office website .1
3/17/2014	AG	0.3	Ecf Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of James E. Arnold, Don E. Barrett Jr., Terry L. Baun, Edward J. Bowman, Ernest P. Boyer, Kevin Bradford, Brandi Brinson, Genisa Carpenter, Hoyt Wayne Clark, Belinda Gilgenbach, Bonnie Jones, Richard Kellogg and John G. Kent., # (2) Consent to Sue of Ken Kollasch, Christopher Dale Lasseeter, Jon B. Leonardelli, Tim Randall, James B. Robbins, Michael Rodewald, Cynthia A. Scaggs, Barbara J. Sheaks, Gary Simone, Kristin Smith, Alan Stanton, Craig Taormina and Doug Teckenbrock.)(
3/17/2014	KW	0.2	telephone call to respond to questions of putative class member concerned about retaliation .1 update case information .1
3/17/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#211 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of James E. Arnold, Don E. Barrett Jr., Terry L. Baun, Edward J. Bowman, Ernest P. Boyer, Kevin Bradford, Brandi Brinson, Genisa Carpenter, Hoyt Wayne Clark, Belinda Gilgenbach, Bonnie Jones, Richard Kellogg and John G. Kent., # (2) Consent to Sue of Ken Kollasch, Christopher Dale Lasseeter, Jon B. Leonardelli, Tim Randall, James B. Robbins, Michael Rodewald, Cynthia A. Scaggs, Barbara J. Sheaks, Gary Simone, Kristin Smith, Alan Stanton, Craig Taormina and Doug Teckenbrock.)(Dunn, Matt)
3/17/2014	KW	0.3	research name consent filing status to respond to query from defendant's counsel .2 email information to defendant counsel .1
3/17/2014	KW	0.5	discussion of consent form, litigation process and fear of retaliation with putative class member .3 open case contact .1 add case information .1
3/17/2014	KW	0.5	discussion with putative class member regarding his concerns that joining will negatively impact his severance payments .2 research statement from Kellogg re severance assurance .1 email link to website and severance statement to putative class member .1 update case information .1
3/17/2014	KW	0.3	telephone call from putative class member regarding need for consent form to join this lawsuit .1 open case contact .1 email consent to sue form to putative class member
3/17/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#210 - AMENDMENT to [209] Joint Status Report by Defendants Kellogg Company, Kellogg Sales Company. (Boudreau, James)
3/17/2014	KW	0.3	telephone discussion with putative class member regarding response to notice and his concerns about retaliation .2 update case notes .1
3/17/2014	MD	0.1	md email defense counsel request for partial social security numbers and telephone numbers to issue notice 0.1
3/17/2014	MR	0.1	assist para CM with excel method of transposing columns to rows .1
3/18/2014	AG	1.2	conduct address verification of RTS
3/18/2014	AG	0.3	reemail notices with updated addresses
3/18/2014	JP	0.1	tried to call, sent email in response to request for info
3/18/2014	KW	0.4	discussion with putative class member regarding joining lawsuit and withdrawal of his consent .2 open case contact .1 email information to paralegal to not file CTS when it arrives .1
3/18/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/18/2014	CLER	0.3	Data Entry of contact information of clients
3/18/2014	CLER	0.4	prepare welcome ltr to new clients

Date	Staff	Amount of Time	Description
3/18/2014	KW	0.4	respond to concerns of putative class member related to possible retaliation by defendant after joining .3 open case contaact .1
3/18/2014	KW	0.3	email response to questions posed by new plaintiff .2 add information to case notes .1
3/18/2014	JP	0.7	fact finding intake
3/18/2014	CLER	0.3	Data Entry of contact information of clients
3/18/2014	CLER	0.4	prepare welcome ltr to new clients
3/18/2014	AG	0.2	ag/kw discussion of refining procedures of filing consents and tracking information for multiple plaintiffs to maximize efficiency .2
3/18/2014	AG	0.3	conduct address verification of RTS
3/18/2014	KW	0.3	answer questions of putative class member related to claims and how to join .2 email consent form to him .1
3/18/2014	KW	0.5	respond to questions from putative class member regarding claims in this case, his eligibility and possible retaliation .3 open case contact .1 sue form to putative class member
3/18/2014	JP	0.1	voice message to request her to email info about her job
3/18/2014	KW	0.3	telephone call form putative class member iwth questions about claims of lawsuit and case process .2 add information to case notes .1
3/18/2014	KW	0.3	update case information .1 respond to plaintiff's questions re filing CTS and his responsibilities going forward .2
3/18/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#212 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Tommy Braswell, Blake Burnett, Kathy Crouch, Jesus DeLaCruz, Mark Ficker, Thomas A. Perteete and Robert L. Piehl.)(Dunn, Matt)
3/18/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Tommy Braswell, Blake Burnett, Kathy Crouch, Jesus DeLaCruz, Mark Ficker, Thomas A. Perteete and Robert L. Piehl.)
3/18/2014	KW	0.2	ag/kw discussion of refining procedures of filing consents and tracking information for multiple plaintiffs to maximize efficiency .2
3/18/2014	JS	0.1	call for KW
3/18/2014	JS	0.1	call for JP, said would call back
3/18/2014	JP	0.1	called and sent email re request for info
3/19/2014	CM	0.2	AG/KW/CM discuss procedures for withdrawal of consents to sue (.2)
3/19/2014	KW	0.2	AG/KW/CM discuss procedures for withdrawal of consents to sue (.2)
3/19/2014	KW	0.2	initial contact call about getting consent form .1 open case contact and add information .1
3/19/2014	KW	0.4	initial call from putative class member regarding his eligibility to join-he ws not on the Notice List.2 open case contact .1 email information to co-paralegal for consultation re California eligibility to join .1
3/19/2014	JP	0.4	discuss facts of TM role in CA as well as switch to RSM job title
3/19/2014	MD	0.1	md/mr discuss needs for ESI depo notice or req for ESI docs
3/19/2014	CM	0.1	check corrections in TM records made after pacer comparison (.1)
3/19/2014	AG	0.2	AG/KW/CM discuss procedures for withdrawal of consents to sue (.2)
3/19/2014	DG	0.2	md/dg discussing meet and confer regarding discovery and the parties proposed discovery plan 0.2
3/19/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Jeremy Faulk, Wendell Mead, Robert Reyes, Cathy L. Thomas, Jacob Ulland and Ken Zabriskie.)

Date	Staff	Amount of Time	Description
3/19/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#213 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jeremy Faulk, Wendell Mead, Robert Reyes, Cathy L. Thomas, Jacob Ulland and Ken Zabriskie.)(Dunn, Matt)
3/19/2014	KW	0.5	fact finding interview for putative class member concerned about possible retaliation if he joined this lawsuit .4 open case contact .1
3/19/2014	MD	0.2	md/dg discussing meet and confer regarding discovery and the parties proposed discovery plan 0.2
3/19/2014	MR	0.1	md/mr discuss needs for ESI depo notice or req for ESI docs
3/19/2014	AG	1.1	review, organize and compare consent to sues filed with docket files
3/19/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/19/2014	CLER	0.4	Data Entry of contact information of clients
3/19/2014	CLER	0.5	prepare welcome ltr to new clients
3/19/2014	KW	1.1	review consents to sue filed and check against electronic files to verify plaintiffs' information 1.1
3/20/2014	MD	0.2	md review third amended complaint for filing 0.2
3/20/2014	AG	0.3	re mail notices with updated addresses
3/20/2014	KW	0.2	respond to questions regarding case process and claims from plaintiff [ ] .2
3/20/2014	AG	0.4	conduct address verification of RTS using SSN
3/20/2014	MD	0.3	md speak with intake about questions he had about case 0.3
3/20/2014	MD	0.1	md call intake about questions he had about case 0.1
3/20/2014	KW	0.3	discuss TM and RSM job duties in PA with new plaintiff .2 add information to case notes
3/20/2014	AG	0.2	ECF Filing of Third AMENDED COMPLAINT against defendant(s) Kellogg Company, Kellogg Sales Company (Attachments: # (1) Certificate of Service)
3/20/2014	AG	0.1	prepare certificate of service for filing
3/20/2014	DG	0.3	post info to website re number of consents obtained so far .3
3/20/2014	MA	0.1	posting case update to Facebook page to keep clients informed
3/20/2014	MR	2	research Kellogg information regarding ESI data
3/20/2014	KW	0.2	prepare format of 3rd Amended Complaint for filing .2
3/20/2014	CLER	0.1	create PDF format of document recd from client
3/20/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Thomas J. Bottichio, William E. Burd, Michael Cueto, Patricia Freyburger, Sara Judd, James T. McKeague, David Meindl, Kirk D. Mushrush, Michael Santangelo Jr., Joseph A. Slattery and Ty Wheeler.)
3/20/2014	MR	0.4	mr/kw discuss criteria and issues related to discovery demands: metrics, IT issues, electronics used by plaintiffs that will show date and time stamp, accounts and locations and type of store, etc
3/20/2014	CLER	0.6	prepare welcome ltr to new clients
3/20/2014	CLER	0.4	Data Entry of contact information of clients
3/20/2014	AG	0.6	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/20/2014	KW	0.4	mr/kw discuss criteria and issues related to discovery demands: metrics, IT issues, electronics used by plaintiffs that will show date and time stamp, accounts and locations and type of store, etc
3/20/2014	DG	0.1	review court order, draft email to def re adjournment of conference .1
3/20/2014	KW	0.4	jp/kw discuss process to continue to verify contact information for each field CTS .1 discuss claims of TM-CA and RSMs and how to manage these claims .3

Date	Staff	Amount of Time	Description
3/20/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#215 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Thomas J. Bottichio, William E. Burd, Michael Cueto, Patricia Freyburger, Sara Judd, James T. McKeague, David Meindl, Kirk D. Mushrush, Michael Santangelo Jr., Joseph A. Slattery and Ty Wheeler.)(Dunn, Matt)
3/20/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#214 - ORDER granting [199] Motion to Amend. Counsel is directed to e-file their Amended Complaint. Signed by Judge Ronald B. Leighton.(DN)
3/20/2014	KW	1.7	verify contact information for recently filed opt-ins 1.7
3/20/2014	JP	0.4	jp/kw discuss process to continue to verify contact information for each field CTS .1 discuss claims of TM-CA and RSMs and how to manage these claims .3
3/20/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#216 - Third AMENDED COMPLAINT against defendant(s) Kellogg Company, Kellogg Sales Company, filed by Patty Thomas. (Attachments: # (1) Certificate of Service)(Getman, Dan)
3/21/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Darrell Aschenbeck, Steve Blevins, Ronald Coker, James Michael Robinson, Robert F. Rutledge and Derrick Sellars.)
3/21/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Darrell Aschenbeck, Steve Blevins, Ronald Coker, James Michael Robinson, Robert F. Rutledge and Derrick Sellars.)(Dunn, Matt)
3/21/2014	CLER	0.2	create PDF format of attorneys notes for case file
3/21/2014	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/21/2014	CLER	0.4	Data Entry of contact information of clients
3/21/2014	MD	1.5	md/dg conference call with defense counsel concerning meet and confer on outstanding discovery and call with Judge Leighton to reschedule court conference 1.5
3/21/2014	CLER	0.4	prepare welcome ltr to new clients
3/21/2014	DG	1.5	md/dg conference call with defense counsel concerning meet and confer on outstanding discovery and call with Judge Leighton to reschedule court conference 1.5
3/21/2014	JS	0.1	JS/MR discuss progress of logging info for updating damage calcs
3/21/2014	MR	0.1	DG/MR discuss whether case will involve timestamp discovery and analysis
3/21/2014	DG	0.1	DG/MR discuss whether case will involve timestamp discovery and analysis
3/21/2014	DG	0.2	dg/md call w JB re changing date of conference w J .2
3/21/2014	MD	0.2	dg/md call w JB re changing date of conference w J .2
3/21/2014	MR	0.1	JS/MR discuss progress of logging info for updating damage calcs
3/21/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#217 - NOTICE of Hearing: Pursuant to the request of counsel, an In-court Scheduling Hearing is set for 4/4/2014 at 02:00 PM in B Courtroom before Judge Ronald B. Leighton. s/Jean Boring as directed. (JAB)
3/24/2014	AG	0.6	conduct address verification of RTS
3/24/2014	MD	0.2	md/mr discussing ESI discovery needs for case 0.2
3/24/2014	MR	1	examined req for docs .2, interrogos responses .2, bates stamped production .3, addressed issue with document index .3
3/24/2014	KW	0.1	correct contact information in electronic file .1

Date	Staff	Amount of Time	Description
3/24/2014	JP	0.2	jp/kw discussion of state class representatives and efforts to file a state class in Pennsylvania .2
3/24/2014	MR	0.1	mr/kw review index of defendant's documents produced and work resolve problem of efficient hyperlink access .1
3/24/2014	KW	0.2	review and create new index of documents produced by defendant to facilitate access to documents by litigation team .2
3/24/2014	AG	0.6	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/24/2014	KW	0.1	mr/kw review index of defendant's documents produced and work resolve problem of efficient hyperlink access .1
3/24/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#219 - MINUTE ORDER Terminating the In-Court scheduling conference [217] set for 4/4/14 and resetting as a Telephone Conference for 4/16/2014 at 09:00 AM, PST. s/Jean Boring as authorized by Judge Ronald B. Leighton. (JAB)
3/24/2014	JP	0.1	jp/kw discuss reaching out to him since he expressed desire to join and we have not received CTS
3/24/2014	CLER	0.6	prepare welcome ltr to new clients
3/24/2014	CLER	0.4	Data Entry of contact information of clients
3/24/2014	CLER	0.6	prepare welcome ltr to new clients
3/24/2014	KW	0.1	jp/kw discuss reaching out to him since he expressed desire to join and we have not received CTS
3/24/2014	CLER	0.5	Data Entry of contact information of clients
3/24/2014	KW	0.2	respond to email questions about filing consent to sue .2
3/24/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Audeliz Benique, Richard Blum, Douglas J. Buescher, David Cordes, Tammy J. Cornmesser, Kristin DeVoe, Rodney Downey, Robert Etscheidt, Thomas C. Gambill, Michael T. Jackson Sr. and Lonnie Jones., # (2) Consent to Sue of Harold Karas, Clint Koch, Joe R. Loya, Dave Madewell, Andrew W. Pollock, Timothy J. Prior, Aubrey E. Smith, E. Neal Staley, Aleta Stock, Kurt Sumrall and Brian Treadaway.)
3/24/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#220 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Audeliz Benique, Richard Blum, Douglas J. Buescher, David Cordes, Tammy J. Cornmesser, Kristin DeVoe, Rodney Downey, Robert Etscheidt, Thomas C. Gambill, Michael T. Jackson Sr. and Lonnie Jones., # (2) Consent to Sue of Harold Karas, Clint Koch, Joe R. Loya, Dave Madewell, Andrew W. Pollock, Timothy J. Prior, Aubrey E. Smith, E. Neal Staley, Aleta Stock, Kurt Sumrall and Brian Treadaway.)(Dunn, Matt)
3/24/2014	KW	0.4	reapond to quesitons regarding eligibility to join .2 open case contact .1 email consent form .1
3/24/2014	CLER	0.1	create PDF format of ltr recd from individual asking not to file CTS sent earlier
3/24/2014	KW	0.2	jp/kw discussion of state class representatives and efforts to file a state class in Pennsylvania .2
3/25/2014	KW	CLER	scan letter from plaintiff re his individual work experience at Kellogg that impacts his claims .1 update electronic file of plaintiff's documents .1 add inforamtion to plaintiff's individual file .1 add information to proof chart .1
3/25/2014	KW	0.2	open case contact of putative class member .1 process mailing of new consent form and notice .1
3/25/2014	KW	CLER	scan letter from Plaintiff [ ] re hours worked .1 update electronic file of plaintiff's documents .1

Date	Staff	Amount of Time	Description
			respond to email from putative class member regarding filing consent to sue .1 add
3/25/2014	KW	0.2	information to case file .1
3/25/2014	KW	0.1	update contact information .1
			respond to email from putative class member regarding filing consent to sue .1 add
3/25/2014	KW	0.2	information to case file .1
3/25/2014	CLER	0.2	Data Entry of contact information of clients
			Transfer documents recd from ECF system to docket file and create file copy(Docket#221 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
3/25/2014	CLER	0.2	Consent to Sue of William T. Estes, # (2) Consent to Sue of Richard T. Wood)(Dunn, Matt)
3/25/2014	MD	1.1	md/dg/jp/kw discussing elements of proof chart, potential claims for business expenses, and records of hours worked
3/25/2014	CLER	0.3	prepare welcome ltr to new clients
3/25/2014	JP	1.1	md/dg/jp/kw discussing elements of proof chart, potential claims for business expenses, and records of hours worked
3/25/2014	KW	1.1	md/dg/jp/kw discussing elements of proof chart, potential claims for business expenses, and records of hours worked
3/25/2014	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/25/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of William T. Estes, # (2) Consent to Sue of Richard T. Wood)
3/25/2014	KW	0.2	telephone call to putative class member to answer his questions regarding joining this lawsuit .1 email consent form to him .1
3/25/2014	KW	0.4	discussion with wife of putative class member regarding concerns about retaliation if husband joins this lawsuit .3 open case contact .1
3/25/2014	KW	0.4	read letter from plaintiff regarding his work experience and unreimbursed expenses working at Kellogg .1 add information to case notes .1 email information to litigation team .1 determine information to be added to issues and proof chart and insert in spreadsheet .1
3/25/2014	KW	0.2	respond to plaintiff's questions re filing his consent to sue .1 add information to case notes .1
3/25/2014	DG	1.1	md/dg/jp/kw discussing elements of proof chart, potential claims for business expenses, and records of hours worked
3/25/2014	KW	0.2	discussion with putative class member who is current employee and has worked for Kellogg for 20 years re value of any claim and possible retaliation .2
3/25/2014	KW	0.1	respond to questions about how to download and print and file consent form .1
3/26/2014	KW	0.2	telephone call from plaintiff to update and correct contact information .1 update case information .1
3/26/2014	CLER	1.2	check original consents to sue and Time Matters data to verify accuracy
3/26/2014	JP	0.7	fact finding intake and discussion of retaliation concerns.
			Transfer documents recd from ECF system to docket file and create file copy(Docket#222 - NOTICE of Filing of Consent To Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
3/26/2014	CLER	0.2	Sue of Robert Vassallo, # (2) Consent to Sue of Eric Wilson, # (3) Consent to Sue of Richard Yaworski)(Dunn, Matt)
3/26/2014	JP	1	fact finding intake and discussion about retaliation concerns
3/26/2014	JP	1.1	fact finding intake
3/26/2014	KW	0.3	respond to telephone call from putative class member regarding how to join .1 open case contact .1 email consent form and explanation .1
3/26/2014	JS	0.1	called for update, ref to KW vm
3/26/2014	JP	0.7	fact finding intake



Date	Staff	Amount of Time	Description
3/26/2014	JP	0.1	jp/kw discussion of more efficient methods of organizing notice, intake and client data .1
3/26/2014	KW	0.1	jp/kw discussion of more efficient methods of organizing notice, intake and client data .1
3/26/2014	CLER	0.7	check original consents to sue and Time Matters data to verify accuracy
3/26/2014	AG	0.2	ECF Filing NOTICE of Filing of Consent To Sues (Attachments: # (1) Consent to Sue of Robert Vassallo, # (2) Consent to Sue of Eric Wilson, # (3) Consent to Sue of Richard Yaworski)
3/26/2014	KW	0.3	initial call from putative class member-concerned about possible retaliation if joining .2
3/26/2014	CLER	0.3	open case contact .1
3/26/2014	CLER	0.3	Data Entry of contact information of clients
3/26/2014	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/26/2014	CLER	0.4	prepare welcome ltr to new clients
3/27/2014	KW	0.2	telephone call from new plaintiff to confirm we received her signed CTS- and to ask questions about next steps .2
3/27/2014	JP	0.7	fact finding intake and discuss lawsuit
3/27/2014	CLER	0.5	Data Entry of contact information of clients
3/27/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#223 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Douglas J. Byrd, David Ricky Campbell, Kristina M. Farias, Rickey Frazier, Linn E. Major, Ronald W. Martin, James Oberst, Lori Rademaker and Randolph V. Thompson.)(Dunn, Matt)
3/27/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Douglas J. Byrd, David Ricky Campbell, Kristina M. Farias, Rickey Frazier, Linn E. Major, Ronald W. Martin, James Oberst, Lori Rademaker and Randolph V. Thompson.)
3/27/2014	CLER	0.3	prepare welcome ltr to new clients
3/27/2014	JP	0.5	fact finding intake
3/27/2014	JS	0.1	wants to join
3/27/2014	MA	0.1	call from client [ ] to confirm receipt of CTS
3/27/2014	JP	0.5	MS/JP discuss facts of intake and reviewed possible exemptions
3/27/2014	MS	0.5	MS/JP discuss facts of intake and reviewed possible exemptions
3/27/2014	KW	0.3	respond to putative class members concerns about possible retaliation and loss of her severance package .2 update case notes .1
3/27/2014	KW	0.3	respond to plaintiff's questions regarding litigation process and timeframe .1 discussion of the value of his claim .1 add information to case notes .1
3/27/2014	KW	0.2	follow-up call to putative class member seeking information .1 add information to case notes .1
3/27/2014	MD	0.1	md speak with intake and discuss severance agreement concerns 0.1
3/27/2014	MR	0.3	research into importing excel file data into TM contacts data .2, email to para JP about same .1
3/27/2014	JP	0.6	fact finding intake
3/27/2014	CLER	0.5	prepare welcome ltr to new clients
3/27/2014	AG	0.6	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/28/2014	JP	0.3	call from anonymous worker to discuss vacation days that are not paid out
3/28/2014	CLER	0.5	prepare welcome ltr to new clients
3/28/2014	CLER	0.3	Data Entry of contact information of clients
3/28/2014	JP	0.7	fact finding intake & discussed retaliation concerns
3/28/2014	MD	0.2	MD/JP review "wage overpayment" documents .
3/28/2014	JP	0.1	email info re joining case

Date	Staff	Amount of Time	Description
3/28/2014	JP	0.5	fact finding intake
3/28/2014	JP	0.2	MD/JP review "wage overpayment" documents .
3/28/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Darrell W. Bishop, Douglas R. Bumgarner, Jeanne Godwin, Mark S. Graham, Philip Lee Nussbaum, Vince Renfrow and Brian K. Wallace.){
3/28/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#228 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Darrell W. Bishop, Douglas R. Bumgarner, Jeanne Godwin, Mark S. Graham, Philip Lee Nussbaum, Vince Renfrow and Brian K. Wallace.)(Dunn, Matt)
3/31/2014	MD	0.1	md review modified consent to sue form 0.1
3/31/2014	KW	0.1	update electronic file of consents to be filed .1
3/31/2014	CM	0.1	call from opt-in to confirm receipt of consent to sue (.1)
3/31/2014	MD	0.1	md confirm w/ clerk court telephone conference 0.1
3/31/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Martin J. Alexa, George Argentino, Martin Ball, Crescenzo Carovillano, Loren E. Gerwick Jr., James Harris Jr., Frank Henderson, Anthony E. Hill, Gregg Hoover and Ray Johnson., # (2) Consent to Sue of Christie Kelly, Thomas Kincaid, Vicki Koshir, William Krogman, Kent A. Kurtz, Mark Lowe, Tim McCoy, Gregory McDonald, Terry N. Mobley and Teresa M. Moore., # (3) Consent to Sue of Lylah-Denise T. Ramsey, Sally Roscoe, Timothy J. Scanlon, Gary D. Sherrod, Derek Tykwinski, and Robert L. Williams Jr.)
3/31/2014	KW	0.2	KW/JP discuss joining RSMs into case or filing new case
3/31/2014	AG	0.7	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
3/31/2014	KW	0.1	KW/JP discuss document re hours of overpayment of wages
3/31/2014	AG	0.2	re mailing notice with updated addresses
3/31/2014	AG	0.4	conduct address verification of RTS mailing (Notices)
3/31/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#225 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Martin J. Alexa, George Argentino, Martin Ball, Crescenzo Carovillano, Loren E. Gerwick Jr., James Harris Jr., Frank Henderson, Anthony E. Hill, Gregg Hoover and Ray Johnson., # (2) Consent to Sue of Christie Kelly, Thomas Kincaid, Vicki Koshir, William Krogman, Kent A. Kurtz, Mark Lowe, Tim McCoy, Gregory McDonald, Terry N. Mobley and Teresa M. Moore., # (3) Consent to Sue of Lylah-Denise T. Ramsey, Sally Roscoe, Timothy J. Scanlon, Gary D. Sherrod, Derek Tykwinski, and Robert L. Williams Jr.)(Dunn, Matt)
3/31/2014	JP	0.2	KW/JP discuss joining RSMs into case or filing new case
3/31/2014	MD	0.1	md call to opt-in's attorney 0.1
3/31/2014	KW	0.3	repsond to questions from putative class member regarding filing consent to sue .2 fax consent form to her .1
3/31/2014	CLER	0.4	prepare welcome ltr to new clients
3/31/2014	KW	0.2	respond to email regarding filing consent to sue .2
3/31/2014	JP	0.3	call to ask if we are settling as per a rumor, discussed expected course of this case
3/31/2014	JP	0.1	KW/JP discuss document re hours of overpayment of wages
3/31/2014	KW	0.1	respond to email from putative class member re joining .1
3/31/2014	MD	0.1	md speaking with attorney about opt-in change to consent to sue form 0.1
3/31/2014	KW	0.5	respond to questions regarding joining this lawsuit .2 open case contact .1 draft cover letter .1 process mailing consent form and explanatory letter .1

Date	Staff	Amount of Time	Description
3/31/2014	CLER	0.5	prepare welcome ltr to new clients
			md/kw discussing follow up with opt-in re amended consent to sue supplied by attorney
3/31/2014	KW	0.1	for opt-in 0.1
			respond to questions from opt-in's spouse about litigation process.2 update case
3/31/2014	KW	0.3	information .1
3/31/2014	CM	0.2	call from client with questions re case (.1), notes on call (.1)
3/31/2014	CLER	0.5	prepare welcome ltr to new clients
			md/kw discussing follow up with opt-in re amended consent to sue supplied by attorney
3/31/2014	MD	0.1	for opt-in 0.1
3/31/2014	JP	0.6	call to confirm he is in the case and get update on case
4/1/2014	DG	0.1	dg/md/kw- discussion of issues involved with [ ] filing CTS for his wife .1
4/1/2014	MD	0.1	dg/md/kw- discussion of issues involved with [ ] filing CTS for his wife .1
4/1/2014	KW	0.1	dg/md/kw- discussion of issues involved with [ ] filing CTS for his wife .1
			md/kw discussion of procedure to file cts, obtain contact information and communicate
4/1/2014	KW	0.2	with plaintiff [ ] .2
4/1/2014	AG	0.4	conduct address verification of RTS mailing (Notices) using SSN
			ECF Filing NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of John F. Conschafsky, Mike McDade, Emily Ann Melton, William Mettler Jr., Carlos Quiles,
4/1/2014	AG	0.2	Sheila Shaffar and Donna Skinner.)
			md/kw discussion of procedure to file cts, obtain contact information and communicate
4/1/2014	MD	0.2	with plaintiff [ ] .2
			Transfer documents recd from ECF system to docket file and create file copy(Docket#226 -
			NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
			Consent to Sue of John F. Conschafsky, Mike McDade, Emily Ann Melton, William Mettler
4/1/2014	CLER	0.2	Jr., Carlos Quiles, Sheila Shaffar and Donna Skinner.)(Dunn, Matt)
4/1/2014	MD	0.1	md contact attorney regarding question for representation of opt-in 0.1
			respond to questions from plaintiff about case progress and next steps .1 update case
4/1/2014	KW	0.2	notes .1
4/1/2014	CLER	0.6	verify data entry of case and contact ifnformation for new opt-ins
4/1/2014	CLER	0.9	verify accuracy of data entry of Consent to Sue informatioin .9
4/1/2014	JS	0.2	called for JP, asking about email to EEOC
			respond to questions from putative class member regarding claims, litigation process,
4/1/2014	KW	0.4	possible retaliation and how to join .2 email consent form .1 open case contact .1
4/1/2014	CLER	0.6	prepare welcome ltr to new clients
4/1/2014	MD	0.1	md/jp discussing status of discovery production 0.1
4/1/2014	JP	0.1	md/jp discussing status of discovery production 0.1
			respond to plaintiff's questions re discovery issues, litigation process and timeframe .4
4/1/2014	KW	0.5	update case notes .1
4/1/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/1/2014	MD	0.1	md review email from defense counsel about contact info for class members 0.1
4/1/2014	CLER	0.4	Data Entry of contact information of clients
			ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of
			Patrick M. Blake, James J. Carter, John J. Dempsey, Mark Francescon, Michael Ray Parks
4/2/2014	AG	0.2	and Jody Rabinsowitz.)
4/2/2014	KW	0.1	fax explanatory message and consent to sue form to putative class member
4/2/2014	MS	0.2	review reminder email issue re notice to people who have previously contacted us

Date	Staff	Amount of Time	Description
4/2/2014	MD	0.1	md/kw discussing contacting intakes about deadline to opt-in to the case 0.1
4/2/2014	JP	0.1	jp/kw discussion of text of reminder email .1
4/2/2014	KW	0.1	jp/kw discussion of text of reminder email .1
4/2/2014	CLER	0.4	prepare welcome ltr to new clients
4/2/2014	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/2/2014	CLER	0.3	Data Entry of contact information of clients
4/2/2014	KW	0.2	Respond to questions from putative class memembr regarding ability to join if he signed severance agreement .1 open case contact-add information .1
4/2/2014	KW	1.1	go through all intake contacts who have not joined to determine who is on the class notice mailing list for the purpose of emailing a reminder, Notice and CTS verify and correct information for each contact as needed
4/2/2014	JP	1.1	go through all intake contacts who have not joined to determine who is on the class notice mailing list for the purpose of emailing a reminder, Notice and CTS verify and correct information for each contact as needed
4/2/2014	KW	0.3	draft reminder email .2 email to litigation team for comment .1
4/2/2014	MD	0.2	md/kw discussion of reminder email to intakes-people who have contacted office for information but not joined .2
4/2/2014	KW	0.2	md/kw discussion of reminder email to intakes-people who have contacted office for information but not joined .2
4/2/2014	CLER	0.8	check consents to sue filed- verify data in files; edit and correct as needed .8
4/2/2014	JS	0.1	call asking for CTS form; JS will fax
4/2/2014	MD	0.1	md review and edit proposed email to intakes 0.1
4/3/2014	KW	0.3	respond to request for information from putative class member .1 open case contact .1
4/3/2014	KW	0.2	Check Kellogg Notice list to verify inforamtion .1
4/3/2014	KW	0.2	respond to plaintiff's questions about case progress .2
4/3/2014	KW	0.1	ag/kw discuss response to request for non-filing of CTS .1
4/3/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#227 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Patrick M. Blake, James J. Carter, John J. Dempsey, Mark Francescon, Michael Ray Parks and Jody Rabinsowitz.)(Dunn, Matt)
4/3/2014	AG	0.1	ag/kw discuss response to request for non-filing of CTS .1
4/3/2014	KW	0.4	discussion of claims and the filing process for consents to sue to join this lawsuit .3 add information to case notes .1
4/3/2014	KW	0.5	scan signed consent to sue .1 draft letter returning consent to putative class member .2 add scanned documents to updated electronic file .1 update case notes .1
4/3/2014	JP	0.5	fact finding intake
4/3/2014	KW	0.2	telephone call to putative class member regarding how to successfully fax consent to sue .2
4/3/2014	JP	0.7	potential plaintiff called to discuss fears and concerns about joining the case and to give his back ground info
4/3/2014	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Tami Baker, Jaqueline Burkink, Gary Childress, Michael Davis II, Mark Glover, William A. Greco, Donna Howell, Richard J. Klauser, Alfred Passero and Timothy J. Pfannenstiel., # (2) Consent to Sue of Larry Ragin, Darrel Shelton, Loyd Vaughn, Walter Watt Jr., and Michael Workman.)
4/3/2014	KW	0.2	respond to plaintiff's questions regarding filing consent to sue .1 verify information in electronic file .1
4/3/2014	JP	0.4	fact finding intake and discussion about retaliation concerns

Date	Staff	Amount of Time	Description
4/3/2014	JP	0.1	called to inform client that his consent to sue needed to be refaxed
			respond to new plaintiff's questions about possible retaliation .1 respond to questions about fees .1 respond to questions about timeframe of litigation .1 open case contact .1
4/3/2014	KW	0.5	add information to case notes .1
4/3/2014	CLER	0.4	Data Entry of contact information of clients
4/3/2014	CLER	0.6	prepare welcome ltr to new clients
4/3/2014	CLER	0.1	Data Entry of contact information of client
4/3/2014	CLER	0.2	prepare welcome ltr to new client
			review attorney;s notes of 3-10-14 meet and confer .1 organize and add to electronic file
4/3/2014	KW	0.2	.1
4/3/2014	AG	0.4	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/3/2014	CLER	0.3	prepare welcome ltr to new clients
			respond to plaintiff's questions regarding document preservation .1 gather initial intake
4/3/2014	KW	0.3	information regarding hours worked and job duties .1 add information to case notes .1
			Transfer documents recd from ECF system to docket file and create file copy(Docket#228 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Tami Baker, Jaqueline Burkink, Gary Childress, Michael Davis II, Mark Glover, William A. Greco, Donna Howell, Richard J. Klauser, Alfred Passero and Timothy J. Pfannenstiel., # (2) Consent to Sue of Larry Ragin, Darrel Shelton, Loyd Vaughn, Walter
4/3/2014	CLER	0.2	Watt Jr., and Michael Workman.)(Dunn, Matt)
4/3/2014	CLER	0.2	Data Entry of contact information of clients
4/3/2014	DG	0.4	call from Jim Popp, atty in TX re facts of Kellogg's treatment of salespeople .4
4/4/2014	CLER	0.5	Data Entry of contact information of clients
4/4/2014	JS	0.1	call re: suit, wants more info., sent to JP vm
			ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Greg Anderson, John W. Beers, Gregory S. Broadfoot, Jason Caserio, Lori Chucci, Sandy Cole, Brandon Dowling, Marcus Freeman, Yonadan Gonzalez and Suzanne Lomax., # (2) Consent to Sue of John Morin, James R. Perry, Ronald G. Raab, Charles K. Reid, Harvey T. Sandefur, Robert St. Clair, Robert Stewart, Gary M. Temke, Maris Tharp, Ryan Tigges and
4/4/2014	AG	0.3	Gregory Wiggins.)
4/4/2014	MA	0.1	call from client [ ]
4/4/2014	JS	0.4	call re: cts cutoff time
4/4/2014	CLER	0.6	prepare welcome ltr to new clients
4/4/2014	JS	0.4	call; sent CTS via eml
			ECF Filing of NOTICE of Filing of Withdrawal of Consent to Sue (Attachments: # (1) Eric T.
4/4/2014	AG	0.1	Kennedy Withdrawal)
4/4/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/4/2014	AG	0.2	prepare Notice of Filing of withdrawal of Consent to Sue and withdrawal for filing
4/4/2014	MD	0.2	md review and edit opt-out notice 0.2
4/4/2014	JS	0.2	call to confirm receipt of CTS; questions about calculating hours
4/4/2014	MD	0.1	md/jp discussing status of Kellogg's discovery production 0.1
4/4/2014	MD	0.1	md email defense counsel about status of discovery production 0.1
4/7/2014	KW	0.8	reveiw and catalogue defendant's production of discovery .8

Date	Staff	Amount of Time	Description
4/7/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#230 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Greg Anderson, John W. Beers, Gregory S. Broadfoot, Jason Caserio, Lori Chucci, Sandy Cole, Brandon Dowling, Marcus Freeman, Yonadan Gonzalez and Suzanne Lomax., # (2) Consent to Sue of John Morin, James R. Perry, Ronald G. Raab, Charles K. Reid, Harvey T. Sandefur, Robert St. Clair, Robert Stewart, Gary M. Temke, Maris Tharp, Ryan Tigges and Gregory Wiggins.)(Dunn, Matt)
4/7/2014	MD	0.4	md call with opt-in plaintiff about the status of the case and potential facts that we may find helpful 0.4
4/7/2014	MD	0.2	md/ag discussing filing of additional consents to sue 0.2
4/7/2014	CLER	0.4	Data Entry of contact information of clients
4/7/2014	AG	0.2	md/ag discussing filing of additional consents to sue 0.2
4/7/2014	KW	0.4	work on indexing defendant's document production .4
4/7/2014	KW	0.2	mr/kw analyze problems in using Mozilla firefox to create hyperlink index of defendant produced documents .2
4/7/2014	MR	0.2	mr/kw analyze problems in using Mozilla firefox to create hyperlink index of defendant produced documents .2
4/7/2014	KW	0.2	telephone call to respond to questions of putative class member .1 add information to case notes .1
4/7/2014	KW	0.4	recheck defendant's document production- to verify 10 Bates stamped documents are missing .4
4/7/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#229 - NOTICE of Filing of Withdrawal of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Eric T. Kennedy Withdrawal)(Dunn, Matt)
4/7/2014	KW	0.1	md/kw discuss documents missing from defendant's production .1
4/7/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#231 NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of David Scott Bell, Cindy Bennett, Kathy A. Bergeron, Grady L. Chuculate, Dompey Courage, Angel Courtney, Sheldan Crowell, Kelly L. DiLorenzo, Anthony D. Garner and Cory Gherke., # (2) Consent to Sue of Keith Gittens, Randall Hab, Tamika Harris, Dennis C. Henry, Matt Holmes, Marquez Jones, Monica Karousos, Aaron Baird Kelly, Kerry Lyons and Arturo Maldonado., # (3) Consent to Sue of James K. McCarty Jr., Charles M. McConville, Steven Mosier, Jeanie L. Nelson, Travis Nesby, Hope Newton, Robert A. Oberst, Antonio Pryor, Aaron Reeves and Luis Ribeiro., # (4) Consent to Sue of Amy Rose, Gus Tarr, Analia Uribe, Steven Lee Wanie, Glen Weber and Stephanie Wintle.)(Dunn, Matt)
4/7/2014	AG	0.3	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of David Scott Bell, Cindy Bennett, Kathy A. Bergeron, Grady L. Chuculate, Dompey Courage, Angel Courtney, Sheldan Crowell, Kelly L. DiLorenzo, Anthony D. Garner and Cory Gherke., # (2) Consent to Sue of Keith Gittens, Randall Hab, Tamika Harris, Dennis C. Henry, Matt Holmes, Marquez Jones, Monica Karousos, Aaron Baird Kelly, Kerry Lyons and Arturo Maldonado., # (3) Consent to Sue of James K. McCarty Jr., Charles M. McConville, Steven Mosier, Jeanie L. Nelson, Travis Nesby, Hope Newton, Robert A. Oberst, Antonio Pryor, Aaron Reeves and Luis Ribeiro., # (4) Consent to Sue of Amy Rose, Gus Tarr, Analia Uribe, Steven Lee Wanie, Glen Weber and Stephanie Wintle.)



Date	Staff	Amount of Time	Description
			respond to emails from putative class members regarding filing consents to sue in this litigation sort emails and forward for filing update electronic files of plaintiffs' contact information .8
4/7/2014	KW	0.8	
4/7/2014	KW	0.1	respond to email from plaintiff regarding date of filing CTS .1
4/7/2014	KW	0.2	update list of plaintiffs and contact informtion .1 email informatin to litigation team .1
4/7/2014	MD	0.2	md review documents produced by kellogg 0.2
4/7/2014	JP	0.1	md/jp discuss kellogg document production 0.1
4/7/2014	CLER	0.6	Data Entry of contact information of clients
4/7/2014	MD	0.1	md/jp discuss kellogg document production 0.1
4/7/2014	MD	0.1	md email defense counsel about document production 0.1
4/7/2014	MD	0.1	md/kw discuss documents missing from defendant's production .1
4/7/2014	CM	0.1	enter contact information and notes on intake call from Friday (.1)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#233 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Jami Baker, Rudy Green, Nancy Larimer, Todd Montgomery and James Osby.)(Dunn, Matt)
4/8/2014	CLER	0.2	
4/8/2014	CLER	0.4	prepare welcome ltr to new clients
4/8/2014	CLER	0.3	prepare welcome ltr to new clients
4/8/2014	JP	0.3	fact finding intake
4/8/2014	CLER	0.2	Data Entry of contact information of clients
4/8/2014	AG	0.5	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing print defendant's answer to amended complaint for comparison to Amended complaint
4/8/2014	KW	0.1	.1
			ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Jami Baker, Rudy Green, Nancy Larimer, Todd Montgomery and James Osby.)
4/8/2014	AG	0.2	
4/8/2014	JP	0.4	fact finding intake
4/8/2014	JS	0.1	create new tm contact; phone call asking about suit
			begin to produce comparison document-comparing amended complaint and def.
4/8/2014	KW	0.4	response .4
			Transfer documents recd from ECF system to docket file and create file copy(Docket#232 - ANSWER to [216] Amended Complaint with JURY DEMAND by Kellogg Company, Kellogg Sales Company.(Nelson, James)
4/8/2014	CLER	0.1	
4/8/2014	JP	0.7	fact finding intake and discussion of concerns about wrongful termination
4/8/2014	CLER	0.3	Data Entry of contact information of clients
			respond to questions regarding lawsuit and ifling consent form .2 open case contact .1
4/8/2014	KW	0.4	email consent form to putative class member .1
			compare Def. Answer to 3rd Amended complaint to 3rd Amended Complaint to facilitate
4/8/2014	KW	0.7	response .7
4/9/2014	AG	0.5	Organization of case file (organizing, proofreading analyzing data)
			client called to volunteer to testify on behalf of the case, shared current work
4/9/2014	JP	0.4	information
4/9/2014	CLER	1.3	prepare welcome ltr to new clients
			respond to questions about filing consent form .1 open case contact and add
4/9/2014	KW	0.2	information .1
4/9/2014	JP	0.1	voice message to request call for intake on state class rep issues
4/9/2014	JP	0.4	fact finding intake
4/9/2014	KW	0.9	complete comparison document-comparing 3rd Amended Complaint and Answer .9

Date	Staff	Amount of Time	Description
4/9/2014	JP	0.4	fact finding intake and discussion about retaliation
4/9/2014	JP	0.1	voice message to request call for intake on state class rep issues
4/9/2014	JP	0.3	fact finding intake
4/9/2014	JP	0.1	voice message to request call for intake on state class rep issues
4/9/2014	KW	0.6	review original signed consent to sue forms to verify name and contact information edit electronic information files as needed
4/9/2014	MR	1.7	explore ways to create hyperlinks from windows folders to create index of Def Prod documents that sorts properly
4/9/2014	KW	1.2	gather all material related to this case, organize paper files; create and label file folders, move files and organize file cabinets
4/9/2014	JP	0.6	fact finding intake
4/9/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sues(Attachments: # (1) Consent to Sue of Alexis Piggee and Phyllis Wagoner.)
4/9/2014	JP	0.2	discussed dates of employment and hours worked
4/9/2014	JS	0.1	wife called to confirm receipt of faxed cts
4/9/2014	JP	1.1	searched for opt ins to be interviewed for potential state class reps
4/9/2014	JS	0.1	called returning JP call
4/9/2014	CLER	0.3	prepare welcome ltr to new clients
4/9/2014	AG	0.3	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/9/2014	CLER	0.2	Data Entry of contact information of clients
4/9/2014	JP	0.3	called for dates of employment and average hours worked
4/9/2014	JP	0.4	fact finding intake
4/9/2014	JP	0.6	discussed case and current facts of overtime hours worked
4/10/2014	KW	1.5	check contact information on consents to sue to verify information in electronic files modify electronic files as needed
4/10/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#235 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Wendy Hixson)(Dunn, Matt)
4/10/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Wendy Hixson)
4/10/2014	AG	0.5	Organization of case file (organizing, proofreading analyzing data)
4/10/2014	CLER	0.1	Data Entry of contact information of client
4/10/2014	CLER	0.2	prepare welcome ltr to new client
4/10/2014	KW	0.2	mr/jp/kw discussion of difficulties in indexing defendant's document production for efficient access by litigation team .2
4/10/2014	JP	0.2	mr/jp/kw discussion of difficulties in indexing defendant's document production for efficient access by litigation team .2
4/10/2014	MR	0.2	mr/jp/kw discussion of difficulties in indexing defendant's document production for efficient access by litigation team .2
4/10/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#234 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Alexis Piggee and Phyllis Wagoner.)(Dunn, Matt)
4/11/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/11/2014	MD	0.1	md review email from defense counsel about discovery 0.1
4/14/2014	KW	0.2	telephone call to putative class member regarding consent received today but dated 3/15/14-.1 add information to case notes .1
4/14/2014	MD	0.1	md/kw discussion of how to proceed regarding cts received today but dated 3/15/14-

Date	Staff	Amount of Time	Description
4/14/2014	KW	0.3	telephone call from plaintiff [ ] to verify filing his consent form to update contact information and to verify his legal name .2 update electronic files with accurate information .1
4/14/2014	KW	0.3	telephone call to putative class member to discuss late mailing of CTS .1 add information to case notes .1 discuss with attorney .1
4/14/2014	JS	0.1	called for update; directed to KW vm
4/14/2014	CLER	0.1	Data Entry of contact information of client
4/14/2014	KW	0.1	md/kw discussion of how to proceed regarding cts received today but dated 3/15/14-
4/14/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/14/2014	CLER	0.2	prepare welcome ltr to new client
4/14/2014	CLER	1.3	check original signed consents to sue against TM electronic record to verify accuracy of electronic file and edit/correct as needed
4/14/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#236 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Joseph Edmonds, # (2) Consent to Sue of Allen Johnson)(Dunn, Matt) ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Joseph Edmonds, # (2) Consent to Sue of Allen Johnson)
4/14/2014	AG	0.2	Joseph Edmonds, # (2) Consent to Sue of Allen Johnson)
4/14/2014	CLER	0.1	Data Entry of contact information of client
4/14/2014	JP	0.8	called to discuss that he is being set up to be fired, and is there any legal recourse follow-up on enquiry about this lawsuit from putative class member who just received
4/15/2014	KW	0.2	Notice .2
4/15/2014	JS	0.3	download and file production docs
4/15/2014	KW	0.2	email to plaintiff [ ] to obtain accurate contact information .1 add information to case file .1
4/15/2014	KW	0.3	email to plaintiff to gather complete and accurate address information .1 telephone call providing complete contact information .1 add information to electronic file .1
4/15/2014	CLER	1.9	check original signed consent to sue form; verify data recorded in electronic file is accurate; verify and correct as needed
4/15/2014	KW	0.5	work on downloading defendnat's production from secure email .5
4/15/2014	KW	0.1	telephone call to plaintiff to secure accurate contact information.1
4/15/2014	CLER	0.8	check original signed consent form to verify and correct contact information on electronic file
4/16/2014	MD	0.1	md/jp discussing bringing additional class actions 0.1
4/16/2014	MD	0.3	md drafting letter to J. Leighton re filing of class action 0.3
4/16/2014	JP	0.1	md/jp discussing bringing additional class actions 0.1

Date	Staff	Amount of Time	Description
4/16/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#238 - MINUTE ORDER SETTING TRIAL AND PRETRIAL DATES ; Jury Trial is set for 9/14/2015 at 09:00 AM in B Courtroom before Judge Ronald B. Leighton. Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 3/18/2015, Motions due by 10/14/2014, Discovery completed by 11/5/2014, Dispositive motions due by 2/6/2015, Attorney settlement conference to be held by 7/8/2015, 39.1 mediation to be completed by 9/4/2015, 39.1 Settlement Report due by 8/18/2015, Motions in Limine due by 8/10/2015, Pretrial Order due by 8/28/2015, Pretrial Conference set for 9/2/2015 at 08:30 AM in B Courtroom before Judge Ronald B. Leighton. Trial briefs to be submitted by 8/28/2015, Proposed voir dire/jury instructions due by 8/28/2015. s/Jean Boring as authorized by Judge Ronald B. Leighton. (JAB)
4/16/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#237 - MINUTE ENTRY for Telephonic proceedings held before Judge Ronald B. Leighton- Dep Clerk: Jean Boring; Pla Counsel: Dan Getman, Matt Dunn; Def Counsel: James Boudreau, James Nelson; CR: None; Scheduling Conference held on 4/16/2014. Counsel outlines their position regarding bifurcation & scheduling. The Court authorizes 20 deposition with leave to allow counsel to file a motion for more. The Court declines to bifurcate. Discovery shall be completed by November 5, 2014. Motion for class certification to be submitted in compliance with LCR23. Call concluded.(JAB)
4/16/2014	MD	0.4	md/dg participate on court conference call 0.4
4/16/2014	MD	0.1	md/ag discussing information needed for court conference 0.1
4/16/2014	AG	0.1	md/ag discussing information needed for court conference 0.1
4/16/2014	DG	0.4	md/dg participate on court conference call 0.4
4/16/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#239 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of William R. Clark)(Dunn, Matt)
4/16/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of William R. Clark)
4/16/2014	CLER	0.2	create PDF format of correspondence recd from D. (production of docs)
4/16/2014	MD	0.1	md/mr discussing court deadlines applicable to MR 0.1
4/16/2014	JP	0.4	called to discuss withdrawling his consent to sue, .3; emailed required documentation to withdraw consent .1
4/16/2014	JP	0.4	called to see if we recieved her CTS. No record of her on file, resent CTS
4/16/2014	CLER	0.1	Data Entry of contact information of client
4/16/2014	CLER	0.2	prepare welcome ltr to new client
4/16/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/16/2014	JP	0.1	md/dg/jp discussing outcome from court conference call (0.3 md/dg; with jp 0.1)
4/16/2014	MD	0.3	md reviewing deadlines imposed by court and updating calendar 0.3
4/16/2014	MD	0.7	md reviewing discovery plan and preparing for telephone conference with court 0.7
4/16/2014	MR	0.1	md/mr discussing court deadlines applicable to MR 0.1
4/16/2014	MD	0.5	md/dg confer in preparation for court conference call 0.5
4/16/2014	DG	1.3	review draft scheduling order .4; review other docs to prepare for conference .1md/dg confer in preparation for court conference call 0.5; edit letter to J Leighton re deadline for class certification .3
4/16/2014	DG	0.3	md/dg/jp discussing outcome from court conference call (0.3 md/dg; with jp 0.1)

Date	Staff	Amount of Time	Description
4/16/2014	MD	0.3	md/dg/jp discussing outcome from court conference call (0.3 md/dg; with jp 0.1)
4/17/2014	CLER	0.1	create PDF format of correspondence recd from D. (Production of documents)
4/17/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Karen Etheridge)
4/17/2014	JP	0.4	call to discuss withdrawing from the case
4/17/2014	AG	0.1	ECF Filing of Letter from Matthew Dunn re [237] Scheduling Conference,, Clarification of Minutes Entry.
4/17/2014	MD	0.6	md draft amended initial disclosures 0.6
4/17/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/17/2014	CLER	0.1	Data Entry of contact information of client
4/17/2014	CLER	0.2	prepare welcome ltr to new client
4/17/2014	MD	0.1	md call judge's clerk re filing of letter for clarification of minute order 0.1
4/17/2014	MD	0.3	md edit letter re clarification of minute order and prepare for filing 0.3
4/17/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#43 - NOTICE of Filing of Consent to Sue. Document filed by Shavez Jackson. (Attachments: # (1) Consent to Sue of Jonathan Zrada)(Getman, Dan)
4/17/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#240 - Letter from Matthew Dunn re [237] Scheduling Conference,, Clarification of Minutes Entry. (Attachments: # (1) Certificate of Service)(Dunn, Matt)
4/17/2014	DG	0.2	review Initial Mandatory Disclosures .2
4/18/2014	MD	0.1	md/dg discussing edits to initial disclosures and outstanding discovery needs 0.1
4/18/2014	DG	0.1	md/dg discussing date/time for discovery planning meeting 0.1
4/18/2014	DG	0.1	md/dg discussing edits to initial disclosures and outstanding discovery needs 0.1
4/18/2014	MD	0.1	md/dg discussing date/time for discovery planning meeting 0.1
4/21/2014	MD	0.4	md/kw discuss filing late consents to sue .1 discuss need to track late consents and the reasons for late filing .1 discuss discovery schedule, number of depositions granted to defendant .2
4/21/2014	KW	0.4	review electronic file of secure email transmission of discovery from defendant to determine what has been produced and identify gaps in Bates document transmission .4
4/21/2014	KW	0.4	md/kw discuss filing late consents to sue .1 discuss need to track late consents and the reasons for late filing .1 discuss discovery schedule, number of depositions granted to defendant .2
4/21/2014	KW	0.2	update calendar with discovery and trial timelines .2
4/21/2014	KW	0.2	respond to plaintiff's email requesting a case update .1 email litigation team re plaintiff's questions .1
4/21/2014	CLER	0.1	Data Entry of contact information of client
4/21/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/21/2014	CLER	0.2	prepare welcome ltr to new client
4/21/2014	CLER	0.2	prepare welcome ltr to new client
4/21/2014	CLER	0.1	Data Entry of contact information of client
4/21/2014	KW	0.3	respond to plaintiff's email requesting case information .2 update case information for plaintiff [ ] .1
4/21/2014	KW	0.7	download CD discs of defendant document production .4 organize electronic dscovery file .3

Date	Staff	Amount of Time	Description
4/21/2014	KW	0.3	email to putative class member re regarding filing CTS .1 open case contact .1 telephone call to discuss why CTS was late .1
4/21/2014	KW	0.3	begin draft to update website and email to plaintiffs to keep them apprised of current information re case developments
4/21/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue of Johanna Goosey, # (2) Consent to Sue of Robin Sweeney)
4/22/2014	MA	0.1	posting case update to Facebook page to keep class informed
4/22/2014	KW	1.2	dg/md/mr/jp/kw litigation team meeting: review litigation calendar, review discovery produced by defendnat to date-identify gaps and problems with production- not native format--determine course of action to correct discovery problems and to get discovery production moving; determine tasks going forward
4/22/2014	DG	0.1	read K's amended initial disclosures .1
4/22/2014	DG	1.2	dg/md/mr/jp/kw litigation team meeting: review litigation calendar, review discovery produced by defendnat to date-identify gaps and problems with production- not native format--determine course of action to correct discovery problems and to get discovery production moving; determine tasks going forward
4/22/2014	JP	1.2	dg/md/mr/jp/kw litigation team meeting: review litigation calendar, review discovery produced by defendnat to date-identify gaps and problems with production- not native format--determine course of action to correct discovery problems and to get discovery production moving; determine tasks going forward
4/22/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#242 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Johanna Goosey, # (2) Consent to Sue of Robin Sweeney)(Dunn, Matt)
4/22/2014	DG	0.5	draft update information for clients re scheduling order and status of case .5
4/22/2014	MD	1.2	dg/md/mr/jp/kw litigation team meeting: review litigation calendar, review discovery produced by defendnat to date-identify gaps and problems with production- not native format--determine course of action to correct discovery problems and to get discovery production moving; determine tasks going forward
4/22/2014	MR	1.2	dg/md/mr/jp/kw litigation team meeting: review litigation calendar, review discovery produced by defendnat to date-identify gaps and problems with production- not native format--determine course of action to correct discovery problems and to get discovery production moving; determine tasks going forward
4/22/2014	KW	0.2	mr/jp/kw discuss organizing and indexing with discovery as it comes in; begin identifying essential discovery still missing and needing to be produced by defendant .2
4/22/2014	MR	0.2	mr/jp/kw discuss organizing and indexing with discovery as it comes in; begin identifying essential discovery still missing and needing to be produced by defendant .2
4/22/2014	JP	0.2	mr/jp/kw discuss organizing and indexing with discovery as it comes in; begin identifying essential discovery still missing and needing to be produced by defendant .2
4/22/2014	DG	0.2	draft letter to J Leighton re appointment of Magistrate .2
4/23/2014	MR	0.3	research into video tracking devices to depict actual work done by plaintiffs



Date	Staff	Amount of Time	Description
4/23/2014	KW	1.1	jp/kw reveiw each point of Plaintiff's document request to Def. and create spreadsheet to track discovery production by defendant
4/23/2014	MR	0.4	resort Bates index document with special formula so bates index is in correct number order
4/23/2014	AG	0.2	ECF Filing of Letter from Matthew Dunn re [238] Minute Order Setting Trial and Pretrial Dates(Attachments: # (1) Certificate of Service)
4/23/2014	AG	0.3	remai welcome ltr to new clients that was RTS
4/23/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#243 - Letter from Matthew Dunn re [238] Minute Order Setting Trial and Pretrial Dates,,, . (Attachments: # (1) Certificate of Service)(Dunn, Matt)
4/23/2014	JP	0.5	jp/kw complete review of documents requested from defendant and creation of tracking spreadsheet
4/23/2014	CLER	0.4	check original signed consents to sue to verify and correct as needed electronic data
4/23/2014	KW	0.8	review discovery produced by defendant .8
4/23/2014	KW	0.6	work on annotating and indexing discovery produced by defendant .6
4/23/2014	DG	0.4	md/dg discussing how to handle discovery delay with defense counsel, proving case by a representative sample, and potential use of video to help prove case 0.4
4/23/2014	MD	0.2	md prepare filing for request for magistrate judge 0.2
4/23/2014	MD	0.1	md edit letter re request for magistrate judge 0.1
4/23/2014	MD	0.2	md write team about potential strategy to prove case 0.2
4/23/2014	KW	0.2	verify discovery received from defendant .2
4/23/2014	MR	0.3	mr/kw discuss discovery produced by defendant- detailing employment summaries which were produced as pdfs -but need to be produced in native format
4/23/2014	MD	0.4	md/dg discussing how to handle discovery delay with defense counsel, proving case by a representative sample, and potential use of video to help prove case 0.4
4/23/2014	MD	0.1	md write defense counsel about outstanding discovery 0.
4/23/2014	KW	0.3	mr/kw discuss discovery produced by defendant- detailing employment summaries which were produced as pdfs -but need ot be produced in native format
4/23/2014	KW	1.4	complete review and annotated indexing of defendant produced documents
4/23/2014	JP	1.1	jp/kw reveiw each point of Plaintiff's document request to Def. and create spreadsheet to track discovery production by defendant
4/24/2014	KW	0.5	MR/KW review and anaysis of pdf documents produced by defendant that need to be produced in a usable format .2 review and analysis of model summary report provided by plaintiff [ ]: discuss information included and usefulness in establishing hours and primary job duty .2 discussion of what needs to be communicated to defendant regarding discovery required .1
4/24/2014	MD	0.2	md/mr discussing discovery needed from defense counsel 0.2
4/24/2014	MD	1	md reviewing discovery kellogg production 1.0
4/24/2014	KW	0.2	md/dg/jp/kw discussing discovery needed from Kellogg, including format of discovery 0.2
4/24/2014	DG	0.3	md/dg/jp/kw discussing discovery needed from Kellogg, including format of discovery 0.2; emails to defs re schedule for meet and confer .1
4/24/2014	MD	0.2	md/dg/jp/kw discussing discovery needed from Kellogg, including format of discovery 0.2

Date	Staff	Amount of Time	Description
4/24/2014	MR	0.1	MD/MR discuss documents we need to obtain from Def
4/24/2014	CLER	0.1	Data Entry of contact information of client
4/24/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
4/24/2014	KW	0.2	respond to email from plaintiff regarding filing his consent to sue .1 forward signed consent for filing .1
4/24/2014	MR	0.1	email exchange with atty MD about Kellogg production
4/24/2014	MD	0.1	MD/MR discuss documents we need to obtain from Def
4/24/2014	MR	0.4	examine email from DG/KW about format issues with Def production .3; email reply to attys/para regarding difference between docs and data .1
4/24/2014	MD	0.3	md compiling list of documents needed for discovery 0.3
4/24/2014	KW	0.3	download defendant's latest production of 1000+ pages of documents add to electronic file .3
4/24/2014	MR	0.6	further examination of examples provided in KW email about Def production
4/24/2014	DG	0.1	email to def re meet and confer tomorrow .1
4/24/2014	MR	0.5	MR/KW review and analysis of pdf documents produced by defendant that need to be produced in a usable format .2 review and analysis of model summary report provided by plaintiff [ ]: discuss information included and usefulness in establishing hours and primary job duty .2 discussion of what needs to be communicated to defendant regarding discovery required .1
4/24/2014	KW	0.2	md/kw discuss format of defendant's document production and issues to be resolved regarding essential need for native format .2
4/24/2014	KW	0.1	update contact information in electronic case file .1
4/24/2014	MR	0.2	locate documents to guide research and edits of our list of documents/data needed from Def
4/24/2014	MD	0.3	md reviewing meet/confer notes re discovery 0.3
4/24/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of William C. Wangerin)
4/24/2014	KW	0.6	analyze defendant's document and draft email to litigation team detailing deficiencies in defendant document production in preparation for conference call .6
4/24/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#244 - NOTICE of Filing of Consent to Sue filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of William C. Wangerin)(Dunn, Matt)
4/24/2014	MD	0.2	md/kw discuss format of defendant's document production and issues to be resolved regarding essential need for native format .2
4/24/2014	MD	0.5	md/kw review defendant current document production. analyze data in planograms, scorecards, job descriptions identify material that needs to be manipulated and needs to be produced in source state-not pdf-
4/24/2014	MR	2.3	make additions and edits to prep sheet (documents we need) for meet and confer conference 1.0, research kellogg systems for mileage reimbursement, handheld sync and gps tracking 1.2, transfer edited doc to server and email to attys/para .1
4/24/2014	KW	0.5	md/kw review defendant current document production. analyze data in planograms, scorecards, job descriptions identify material that needs to be manipulated and needs to be produced in source state-not pdf-
4/24/2014	MR	0.2	md/mr discussing discovery needed from defense counsel 0.2
4/24/2014	CLER	0.2	prepare welcome ltr to new client
4/24/2014	JP	0.2	md/dg/jp/kw discussing discovery needed from Kellogg, including format of discovery 0.2

Date	Staff	Amount of Time	Description
4/25/2014	MD	0.1	md/mr discussing results of conversation with defense counsel about discovery production 0.1
4/25/2014	AG	0.3	prepare Notice of Filing of Withdrawal Consents to Sue and withdrawal for filing
4/25/2014	AG	0.3	prepare opt-out confirm ltr to former clients
4/25/2014	CLER	0.1	Data Entry of updated information of client
4/25/2014	MR	0.1	md/mr discussing results of conversation with defense counsel about discovery production 0.1
4/25/2014	AG	0.1	ECF Filing of NOTICE of Filing of Withdrawal of Consent to Sues (Attachments: # (1) Dennis Henry withdrawal, # (2) James McCarty withdrawal)
4/25/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#245 - NOTICE of Filing of Withdrawal of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Dennis Henry withdrawal, # (2) James McCarty withdrawal)(Dunn, Matt)
4/25/2014	MD	1.0	md prepare for call with defense counsel 1.0
4/25/2014	CLER	0.1	create PDF format of correspondence recd from D. ( CD containing docs bates Kellogg- 016383-019857)
4/25/2014	JP	0.2	md/jp discussing additional named plaintiffs to represent state classes 0.2
4/25/2014	MD	0.2	md/jp discussing additional named plaintiffs to represent state classes 0.2
4/25/2014	MR	0.1	prep for meet-and-confer with Def C
4/25/2014	MD	1.3	md/dg/mr telephone conference with defense counsel about outstanding discovery 1.3
4/25/2014	MR	1.3	md/dg/mr telephone conference with defense counsel about outstanding discovery 1.3
4/25/2014	DG	1.3	md/dg/mr telephone conference with defense counsel about outstanding discovery 1.3
4/28/2014	MD	0.6	md drafting list of outstanding documents 0.6
4/28/2014	KW	0.2	read retainer emailed to plaintiff to prepare for follow-up discussion .2
4/28/2014	MD	0.7	md drafting outline for proof chart 0.7
4/28/2014	MD	0.1	md respond to defense counsel email 0.1
4/28/2014	KW	0.2	md/kw- confer regarding latest discovery produced, results of conference with defense counsel, most efficient method to track discovery requested and discovery produced, and discovery missing .2
4/28/2014	MD	0.8	md researching outside sales exemption 0.8
4/28/2014	MD	0.2	md/kw- confer regarding latest discovery produced, results of conference with defense counsel, most efficient method to track discovery requested and discovery produced, and discovery missing .2
4/29/2014	DG	0.1	dg/kw discuss response to plaintiff regarding can he sign severance agreement at termination .1
4/29/2014	KW	0.2	telephone call to plaintiff regarding freedom to sign severance agreement .1 update case information
4/29/2014	KW	0.1	dg/kw discuss response to plaintiff regarding can he sign severance agreement at termination .1
4/29/2014	MD	3.7	md researching DSD and outside sales exemption 3.7
4/29/2014	MS	0.1	send inventory is not sales research to md and dg
4/30/2014	KW	0.2	respond to email from plaintiffs regarding updating conact information .1 update contact information in case data base .1
4/30/2014	KW	1.1	download discovery produced by defendant review each pdf and add notation as to contents to electronic file

Date	Staff	Amount of Time	Description
4/30/2014	MD	0.4	md/kw review discovery produced by Kellogg .2 modify document tracking spreadsheet to include documents which need to be requested .1 discuss role of developing dsd program for merchandizing and the need to request detailed information about Kellogg DSD program .1
4/30/2014	MD	0.5	md reviewing/editing list of outstanding documents 0.5
4/30/2014	MD	0.3	md researching outside sales exemption and use of planograms 0.3
4/30/2014	MD	0.1	md email defense counsel about outstanding documents 0.1
4/30/2014	KW	0.4	md/kw review discovery produced by Kellogg .2 modify document tracking spreadsheet to include documents which need to be requested .1 discuss role of developing dsd program for merchandizing and the need to request detailed information about Kellogg DSD program .1
5/1/2014	MD	2	outside sales research 2.0
5/1/2014	CM	0.1	contact team members re final reconciliation of consents to sue, pacer, TM records (.1)
5/1/2014	KW	0.4	initial intake interview with opt-in [ ]- .3 add information to case notes .1
5/1/2014	DG	0.5	research on K's decision to improve DSD through TMs and RSRs .5
5/1/2014	KW	0.4	discussion of his problems with Kellogg re signing severance and continuing to be part of this lawsuit .3 update case notes .1
5/2/2014	MD	0.4	md call with defense counsel about status of documents 0.4
5/2/2014	MD	0.5	md prepare for call with defense counsel 0.5
5/5/2014	KW	0.2	respond to named plaintiff's request for information regarding dealing with issues regarding injury while employed at Kellogg .2
5/5/2014	MD	0.1	md read letter from defense counsel about discovery from plaintiffs 0.1
5/5/2014	CLER	0.1	create PDF format of correspondence recd from D. (CD documents bates 026699-028008)
5/5/2014	CLER	0.1	create PDF format of correspondence recd from D. (Rule 26)
5/6/2014	MD	0.7	md prepare 30b6 ESI deposition notice 0.7
5/6/2014	MD	0.1	md email defense counsel about changes to protective order 0.1
5/6/2014	MD	0.5	md researching obligation for breadth of initial disclosures 0.5
5/6/2014	KW	0.2	respond to plaintiff's questions bout case process and progress .2
5/6/2014	MD	0.1	md email defense counsel about corrupted CD 0.1
5/6/2014	CLER	0.1	create PDF format of correspondence recd from D. ( CD documents 028005-029356)
5/6/2014	MD	0.5	md call with client about settlement 0.5
5/6/2014	MD	0.3	md reviewing defendants discovery production 0.3
5/6/2014	KW	0.3	download 3 CD discs of production from defendant .3
5/6/2014	KW	0.6	fact finding interview with plaintiff who worked at Morning Foods as RSR and TM in Snacks.5 add information to case notes .1
5/6/2014	MD	0.1	md/kw explain problem of corrupted disc received form defendant to attorney .1
5/6/2014	MR	0.2	mr/kw try to solve problem of corrupted disc of information received from defendant .2
5/7/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Christine Putman)
5/7/2014	MD	0.3	md/mr conference call with defense counsel about production of payroll records in native format 0.2 and discussing edits to 30b6 deposition notice 0.1
5/7/2014	MR	0.2	md/mr discussing response to defense counsel's message about production of payroll records 0.2
5/7/2014	MR	0.3	md/mr conference call with defense counsel about production of payroll records in native format 0.2 and discussing edits to 30b6 deposition notice 0.1

Date	Staff	Amount of Time	Description
5/7/2014	CLER	0.2	prepare welcome ltr to new client
5/7/2014	CLER	0.1	Data Entry of contact information of client
5/7/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
5/7/2014	KW	0.2	respond to questions from putative class member regarding possibility of joining .2
5/7/2014	MR	0.9	add and edit atty MD draft of 30b6 ESI notice, email to MD about same
5/7/2014	KW	0.4	check and verify contact informatio for opt-ins .4
5/7/2014	MR	0.2	KW/MR discuss Def letter and process for checking on opt-out status
5/7/2014	KW	0.2	KW/MR discuss Def letter and process for checking on opt-out status
5/7/2014	MR	0.1	listen to audio message from atty MD about Def payroll production, then call MD
5/7/2014	CLER	0.2	create PDF format of correspondence recd from D. ( replacement CD for 5/1/2014
5/7/2014	CLER	0.2	document production 026699- 028004 and CDs 029357-03140)
5/7/2014	MD	0.2	md/mr discussing response to defense counsel's message about production of payroll records 0.2
5/7/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#246 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Christine Putman)(Dunn, Matt)
5/8/2014	CLER	0.1	create PDF format of correspondence recd from D.( Opt in data reveiw)
5/8/2014	KW	1.2	download 5 discs of discovery documents received from defendant .8 organize excel
5/8/2014	CLER	0.2	spreadsheets and pdf documents for efficient access by litigation team .4
5/8/2014	AG	0.1	prepare welcome ltr to new client
5/8/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to SueAttachments: # (1) Consent to Sue of Sheree Magera)
5/8/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#247 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Sheree Magera)(Dunn, Matt)
5/8/2014	CLER	0.1	Data Entry of contact information of client
5/8/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
5/8/2014	KW	0.4	respond toplaintiff's concerns about possible retaliation in hiring if she continues as a plaintiff in this lawsuit .3 add information to case notes .1
5/8/2014	CLER	0.1	create PDF format of correspondence recd from D.(CD document production 031042-033043)
5/8/2014	MR	0.7	examined kellogg scorecard reports we received in xls format from Def .3, examined kellogg pay stubs .3, email to MD about pay stubs including hours .1
5/9/2014	MD	0.5	md review/edit confidentiality agreement 0.5
5/9/2014	MR	0.2	save messages and pdf about Opt-Outs .1, file organization related to case .1
5/9/2014	JS	0.1	call to confirm receipt of retainer
5/9/2014	MR	0.2	review depo notice for mentions of email and time zones
5/9/2014	MD	0.7	md call with defense counsel about discovery production 0.7
5/9/2014	MD	0.5	md prepare for call with defense counsel re discovery production .5
5/9/2014	CM	2.8	reconciliation of pacer and TM records of opt-ins (2.8)
5/12/2014	KW	0.2	email and telephone call to let [ ] know we did not receive the last page of the retainer as state class rep for CO.
5/12/2014	MD	2	md drafting response letter to defense counsel about initial disclosures, discovery, and opt-ins that filed past the SOL 2.0
5/12/2014	CM	1.1	enter new opt-in information into TM (1.1)
5/12/2014	KW	0.1	KW/CM discuss checking of original consents to sue (.1)
5/12/2014	MD	0.3	md reviewing supplemental interrogatory responses produced by Kellogg 0.3
5/12/2014	CM	0.1	KW/CM discuss checking of original consents to sue (.1)

Date	Staff	Amount of Time	Description
5/12/2014	KW	0.2	download documents produced by defendant .2
5/12/2014	CM	0.1	AG/CM discuss correcting discrepancies between pacer and TM records (.1)
5/12/2014	MD	0.2	md/dg discussing response to Kellogg's discovery letter 0.2
5/12/2014	KW	0.2	download documents from Cd produced by defendant .2
5/12/2014	AG	0.1	AG/CM discuss correcting discrepancies between pacer and TM records (.1)
5/12/2014	DG	0.2	md/dg discussing response to Kellogg's discovery letter 0.2
5/12/2014	KW	0.1	open case contact for putative class member .1
5/12/2014	KW	0.1	email to prospective state class rep [ ] regarding processing retainer .1
5/13/2014	KW	0.3	jp/kw discuss discovery produced by defendant and work needed to review and index .3
5/13/2014	MD	0.2	md review edits to letter regarding discovery and initial disclosures 0.2
5/13/2014	JP	0.3	jp/kw discuss discovery produced by defendant and work needed to review and index .3
5/13/2014	MD	0.2	md review edits to proposed confidentiality agreement and send to local counsel 0.2
5/13/2014	DG	0.7	edit draft confidentiality order .6; email to MD re next steps and conferencing with local counsel re same .1
5/13/2014	CLER	0.1	create PDF format of correspondence recd from D. (CD containing documents KELLOGG-035165-036719)
5/13/2014	DG	0.6	edit letter to Boudreau re def's letter of 5/2 re discovery of opt-ins .6
5/13/2014	JP	0	jp/kw- work with new intern to teach her how to review and split defendant's document production into usable components of plaintiffs' personnel files .4
5/14/2014	MR	0.1	assist clerical person with issue at workstation where she was processing Def production
5/14/2014	MD	0.1	md/dg discussing letter to defense counsel about discovery and initial disclosures 0.1
5/14/2014	DG	0.4	md/dg discussing letter to defense counsel about discovery and initial disclosures 0.1; email to MD re same .1; edits to draft response letter re discovery to JBoudreau .2
5/14/2014	KW	1.4	jp/kw review defendant's discovery production to date .3 reorganize spreadsheet to track def. discovery production- what has been requested, what has been received and what needs follow-up.
5/14/2014	JP	1.4	jp/kw review defendant's discovery production to date .3 reorganize spreadsheet to track def. discovery production- what has been requested, what has been received and what needs follow-up.
5/14/2014	KW	0.4	mr/kw review defendant's document production to resolve access and organization issues to make information more accessible to litigation team
5/14/2014	JP	1.4	jp/kw review defendant's discovery production to date .3 reorganize spreadsheet to track def. discovery production- what has been requested, what has been received and what needs follow-up.
5/14/2014	MR	1.7	address problematic huge pdf production file from Defendant
5/14/2014	MD	0.2	md/dg conferring about various discovery issues 0.2
5/14/2014	MD	0.6	md respond to defense counsel about protective order, may 2nd letter, and email about kellogg's good faith defense 0.6
5/14/2014	MD	0.1	md write defense counsel about 30b6 esi deposition 0.1
5/14/2014	MD	0.1	md/mr discussing 30b6 esi deposition date 0.1
5/14/2014	MR	0.1	md/mr discussing 30b6 esi deposition date 0.1
5/14/2014	DG	0.2	md/dg conferring about various discovery issues 0.2



Date	Staff	Amount of Time	Description
5/15/2014	MR	0.4	jp/mr/kw review defendant's discovery production to date to determine quality and usefulness of production; discussion of need to protest huge unusable files of unreadable material
5/15/2014	CLER	0.1	create PDF format of correspondence recd from D. ( Cd containing documents KELLOGG 039195-040796)
5/15/2014	JP	0.4	jp/mr/kw review defendant's discovery production to date to determine quality and usefulness of production; discussion of need to protest huge unusable files of unreadable material
5/15/2014	MD	0.8	dg/md/jp/zgp/kw meet to review discovery received, review and revise system for tracking discovery received from defendant; discuss expansion of proof chart and develop a plan for inserting proof documents into proof chart
5/15/2014	DG	0.3	dg/mr discuss def's failure to comply with our discovery request in terms of form of ESI .3
5/15/2014	MR	0.3	dg/mr discuss def's failure to comply with our discovery request in terms of form of ESI .3
5/15/2014	KW	0.4	jp/mr/kw review defendant's discovery production to date to determine quality and usefulness of production; discussion of need to protest huge unusable files of unreadable material
5/15/2014	MR	0.6	mr/kw in depth analysis of excel spreadsheets produced by defendant- to assess content and import of data
5/15/2014	MD	0.3	md reviewing discovery issues for team meeting 0.3
5/15/2014	KW	0.8	dg/md/jp/zgp/kw meet to review discovery received, review and revise system for tracking discovery received from defendant; discuss expansion of proof chart and develop a plan for inserting proof documents into proof chart
5/15/2014	JP	0.8	dg/md/jp/zgp/kw meet to review discovery received, review and revise system for tracking discovery received from defendant; discuss expansion of proof chart and develop a plan for inserting proof documents into proof chart
5/15/2014	KW	0.6	mr/kw in depth analysis of excel spreadsheets produced by defendant- to assess content and import of data
5/15/2014	DG	0.8	dg/md/jp/zgp/kw meet to review discovery received, review and revise system for tracking discovery received from defendant; discuss expansion of proof chart and develop a plan for inserting proof documents into proof chart
5/16/2014	MD	0.2	dg/md review proposed changes to confidentiality order form of court .2
5/16/2014	DG	0.4	dg/md review proposed changes to confidentiality order form of court .2; review current draft of same .2
5/16/2014	MD	1	md drafting/sending letter to defense counsel about production of documents in Native format 1.0
5/16/2014	JP	0.3	called to find out if he can still join and to discuss his wife being kicked off health insurance by Kellogg and if discriminatory action
5/16/2014	JS	0.2	call re: suit--possible late joinder
5/16/2014	MD	1	md editing proposed protective order 1
5/19/2014	CLER	0.1	create PDF format of correspondence recd from D. ( Cd containing documents KELLOGG043766-045702)
5/19/2014	MR	0.1	read and reply to email from para JP about large pdf files from Def
5/19/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
5/19/2014	CLER	0.2	prepare welcome ltr to new client
5/19/2014	CLER	0.1	Data Entry of contact information of client
5/19/2014	CLER	0.1	create PDF format of correspondence recd from D. ( Cd containing documents KELLOGG 040797-043765)

Date	Staff	Amount of Time	Description
5/19/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Alfonso Vasquez)
5/19/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#248 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Alfonso Vasquez)(Dunn, Matt)
5/19/2014	MD	0.2	md/jp discussing Kellogg's discovery production 0.2
5/19/2014	JP	0.2	md/jp discussing Kellogg's discovery production 0.2
5/19/2014	CM	0.1	assist JP in downloading def docs (.1)
5/19/2014	MR	0.3	review and revise draft ltr by atty MD to Kellogg about issues with Def production .3
5/20/2014	MD	1	md researching colorado law for class action claims and editing class action complaint 1.0
5/21/2014	MR	0.3	JP/MR work on figuring out how to download docs from Def FTP site
5/21/2014	JP	0.3	JP/MR work on figuring out how to download docs from Def FTP site
5/21/2014	MR	0.1	read and reply to email from para JP about problem in downloading Def documents from FTP site
5/21/2014	MR	0.1	read and reply to atty MD forwarding email from Def C about discovery
5/21/2014	MD	0.5	md editing amended complaint and researching north carolina law 0.5
5/21/2014	MD	0.1	md follow up with defense counsel about 30b6 ESI deposition 0.1
5/21/2014	MD	3	md drafting proof chart 3.0
5/21/2014	MD	0.4	md reviewing defendants' document production for weekly conversation about discovery 0.4
5/21/2014	CLER	0.1	GA setup database accounts for clerical pt employees for case data entry and file organization
5/22/2014	CLER	0.1	create PDF format of correspondence recd from D. (KELLOGG-043703-046399)
5/23/2014	MD	0.5	md participate on call with defense counsel regarding discovery 0.5
5/23/2014	MD	0.2	md/jp discussing Kellogg's discovery production 0.2
5/23/2014	JP	0.2	md/jp discussing Kellogg's discovery production 0.2
5/23/2014	MD	0.1	md email defense counsel about rescheduling discovery meeting 0.1
5/23/2014	MD	0.3	md prepare for call with defense counsel about outstanding discovery 0.3
5/27/2014	MD	0.5	md drafting letter response to defense counsel 0.5
5/27/2014	CLER	0.1	create PDF format of correspondence recd from D. ( CD containing documents KELLOGG-046405-048092)
5/28/2014	DG	0.1	dg/jp review doc showing client working 80 hrs/wk .1
5/28/2014	JP	0.1	dg/jp review doc showing client working 80 hrs/wk .1
5/28/2014	DG	0.1	review response to JB re confidentiality order .1
5/28/2014	MD	0.3	md drafting discovery demands 0.3
5/28/2014	MD	0.3	md drafting response to defense counsel about protective order 0.3
5/28/2014	DG	0.2	md/dg discussing status of case and kellogg's discovery production 0.2
5/28/2014	MD	0.2	md/dg discussing status of case and kellogg's discovery production 0.2
5/29/2014	MD	0.2	md drafting response to defense counsel about protective order 0.2
5/29/2014	MD	0.1	md write ag about researching case documents from another wage and hour litigation against Kellogg 0.1
5/29/2014	MD	0.1	md/mr discussing topics to cover during inhouse status conference
5/29/2014	MR	0.1	md/mr discussing topics to cover during inhouse status conference
5/29/2014	MD	0.2	md reviewing Kellogg's discovery demands 0.2
5/29/2014	DG	0.3	md/dg discussing Kellogg's discovery demands 0.3
5/29/2014	MD	0.3	dg/md discuss defs' 4 boxes of doc requests and interrogatories ..2; dg/md discuss arguments to make re confidentiality order .1
5/29/2014	MD	0.3	md/dg discussing Kellogg's discovery demands 0.3

Date	Staff	Amount of Time	Description
5/29/2014	MD	0.2	md emailing DG re discovery demands 0.2
5/29/2014	MD	0.1	md send discovery demand to defense counsel 0.1
5/29/2014	MD	0.4	md drafting requests to admit and document demand 0.4
5/29/2014	MD	0.2	md write defense counsel email response about protective order 0.2
5/29/2014	CLER	0.1	create PDF format of correspondence recd from D. ( CD containing documents KELLOGG-048094-050794
5/29/2014	DG	0.7	dg/md discuss defs' 4 boxes of doc requests and interrogatories ..2; dg/md discuss arguments to make re confidentiality order .1; redraft email to Boudreau re confidentiality order .4
5/29/2014	MD	0.1	md reviewing case citing the outside sales exemption
5/30/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue Attachments: # (1) Consent to Sue of Richard Newton)
5/30/2014	CM	0.1	call from client re status of case (.1)
5/30/2014	DG	0.9	md/dg/mr/jp discussing case status, including discovery to complete
5/30/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#249 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Richard Newton)(Dunn, Matt)
5/30/2014	JP	0.9	md/dg/mr/jp discussing case status, including discovery to complete
5/30/2014	MD	0.9	md/dg/mr/jp discussing case status, including discovery to complete
5/30/2014	MR	0.9	md/dg/mr/jp discussing case status, including discovery to complete
5/30/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
5/30/2014	CLER	0.2	prepare welcome ltr to new client
5/30/2014	CLER	0.1	Data Entry of contact information of client
6/2/2014	CLER	0.1	Data Entry of contact information of client
6/2/2014	MD	0.5	md review Kellogg company policies for prohibition on videotaping employees 0.5
6/2/2014	CLER	0.2	prepare welcome ltr to new client
6/2/2014	KW	0.3	prepare Discovery Requests and mail to defendant's counsel .3
6/2/2014	MD	0.1	dg/md discuss how to handle Nelson's evasion of answering how many different sets of discovery served .1
6/2/2014	MD	0.2	md emailing defense counsel about 30b6 ESI deposition, discovery of opt-ins, and protective order 0.2
6/2/2014	KW	0.3	update electronic discovery production file .3
6/2/2014	DG	0.1	dg/md discuss how to handle Nelson's evasion of answering how many different sets of discovery served .1
6/2/2014	MD	0.4	md/kw discuss defendant's discovery demands propounded for each of more than 800 plaintiffs .2 determine tasks needing completion in response .2
6/2/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#250 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Eric Holland)(Dunn, Matt)
6/2/2014	MD	0.1	md/kw discussing kellogg's policies on videotaping employees 0.1
6/2/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/2/2014	KW	0.1	md/kw discussing kellogg's policies on videotaping employees 0.1
6/2/2014	KW	0.5	download discovery demands for each plaintiff .2 review categories of demands for Morning Foods and Snack Foods plaintiffs .3
6/2/2014	KW	0.4	md/kw discuss defendant's discovery demands propounded for each of more than 800 plaintiffs .2 determine tasks needing completion in response .2
6/2/2014	MD	2.5	md reviewing kellogg discovery production 2.5
6/2/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Eric Holland)

Date	Staff	Amount of Time	Description
6/2/2014	KW	0.1	update electronic correspondence file
			mr/jp/kw discussion of the best method to deal with huge files of documents produced by defendant-how to keep them original and still make them usable and accessible to
6/3/2014	KW	0.3	litigation team
6/3/2014	KW	0.2	organize and file original consent to sue forms .2
6/3/2014	MD	0.3	md reviewing complaint and final judgment in other kellogg overtime case 0.3
6/3/2014	MD	0.5	md reviewing kellogg's document production 0.5
			mr/jp/kw discussion of the best method to deal with huge files of documents produced by defendant-how to keep them original and still make them usable and accessible to
6/3/2014	MR	0.3	litigation team
			mr/jp/kw discussion of the best method to deal with huge files of documents produced by defendant-how to keep them original and still make them usable and accessible to
6/3/2014	JP	0.3	litigation team
			compare electronic file with original consent form and verify contact information in
6/3/2014	KW	0.1	electronic file .1
			research case documents FOR Murry v. Kellogg Sales Company, No. 8C411211 (Los
6/3/2014	AG	0.3	Angeles Superior Court, Apr. 6, 2009)
6/3/2014	MD	0.1	md call attorneys in other Kellogg case 0.1
			compare electronic file with original consent form and update contact information in
6/3/2014	KW	0.1	electronic file .1
6/3/2014	MD	0.1	md research attorneys contact information for other kellogg TM case 0.1
			compare electronic file with original consent form and verify contact information in
6/3/2014	KW	0.1	electronic file .1
			md prepare for telephone call with defense counsel about protective order and discovery
6/3/2014	MD	0.1	0.1
			md/dg discussing md call with JB re protective order, other Kellogg case, and 30b6 ESI
6/3/2014	DG	0.2	deposition 0.2
6/3/2014	MD	1	md research outside sales exemption 1.0
			md/dg discussing md call with JB re protective order, other Kellogg case, and 30b6 ESI
6/3/2014	MD	0.2	deposition 0.2
6/3/2014	MD	0.5	md drafting subpoenas for 3rd party documents 0.5
6/3/2014	MD	0.2	md draft outline of topics to cover with counsel from other Kellogg overtime case 0.2
			mr/jp/kw discuss data management issues of managing data produced by defendant in a
6/4/2014	MR	0.7	variety of formats for all opt-ins .7
			mr/jp/kw discuss data management issues of managing data produced by defendant in a
6/4/2014	JP	0.7	variety of formats for all opt-ins .7
			md speak with plaintiffs' counsel in other kellogg sales company case and follow up with
6/4/2014	MD	0.2	email 0.2
6/4/2014	MD	0.2	md/mr discussing 30b6 ESI deposition notice topcis/date/time 0.2
			jp/kw review voluminous production of documents produced by defendant and discuss most efficient and useful methods to organize and make the information usable to
6/4/2014	JP	1.5	litigation team 1.5
			mr/jp/kw discuss data management issues of managing data produced by defendant in a
6/4/2014	KW	0.7	variety of formats for all opt-ins .7
			jp/kw review voluminous production of documents produced by defendant and discuss most efficient and useful methods to organize and make the information usable to
6/4/2014	KW	1.5	litigation team 1.5
6/4/2014	MR	0.2	md/mr discussing 30b6 ESI deposition notice topcis/date/time 0.2
6/4/2014	MD	0.1	md modify 30b6 ESI deposition notice 0.1

Date	Staff	Amount of Time	Description
6/4/2014	MD	0.5	md reviewing and drafting objections to Kellogg's discovery demands 0.5
6/4/2014	MD	0.1	md collecting potential exhibits for 30b6 ESI Dep 0.1
6/4/2014	MD	0.1	md corresponding with defense counsel about 30b6 ESI deposition 0.1
6/5/2014	KW	0.4	respond to questions from plaintiff [ ] regarding ramifications of possibly returning to work at Kellogg and questions about possible retaliation .3 update case notes .1
6/5/2014	MD	0.1	md email defense counsel about production of discovery 0.1
6/5/2014	AG	0.2	arrange Court reporter for 30(b)(6) Deposition
6/5/2014	KW	1.9	jp/kw thorough review and analysis of document production of defendant to determine what has been received and what is missing
6/5/2014	JP	1.9	jp/kw thorough review and analysis of document production of defendant to determine what has been received and what is missing
6/6/2014	DG	0.1	md/dg discussing discovery production in case and 30b6 deposition 0.1
6/6/2014	MD	0.1	md/dg discussing discovery production in case and 30b6 deposition 0.1
6/6/2014	MD	0.2	md reviewing list of documents needed from Murry case 0.2
6/6/2014	MD	0.1	md call defense counsel about outstanding discovery 0.1
6/6/2014	MD	0.1	md review edits to protective order 0.1
6/6/2014	DG	0.1	md/dg discussing state class action against kellogg 0.1
6/6/2014	MD	0.1	md/dg discussing state class action against kellogg 0.1
6/6/2014	MD	0.4	md reading California state class action decision and plaintiffs motion for class certification 0.4
6/6/2014	AG	0.2	MD/AG discussion on documents related to Murray v. Kellogg
6/6/2014	AG	0.5	obtaining documents file with CA superior court (CASE# BC411211)
6/6/2014	MD	0.2	MD/AG discussion on documents related to Murray v. Kellogg
6/9/2014	KW	0.2	create and update electronic files for previous court cases which may impact discovery in this case
6/9/2014	MD	0.2	md reviewing kellogg's arguments against class certification in Murry case 0.2
6/9/2014	KW	0.3	update contact information in electronic file .1 respond to plaintiff's email regarding litigation time frame .1 update case notes .1
6/9/2014	DG	0.2	draft discovery re Murray case .2
6/9/2014	KW	0.3	md/kw discussion of discovery received from plaintiff and discovery needed .1 discussion of facts of Murry v Kellogg and impact on plaintiff's discovery demands .1 review electronic file to determine most efficient and accessible filing of related case material .1
6/9/2014	MD	0.3	md/kw discussion of discovery received from plaintiff and discovery needed .1 discussion of facts of Murry v Kellogg and impact on plaintiff's discovery demands .1 review electronic file to determine most efficient and accessible filing of related case material .1
6/10/2014	MD	0.1	md reviewing discovery regarding SOL issues for opt-ins 0.1
6/10/2014	DG	0.1	review def proposal re dismissing optins .1
6/10/2014	DG	0.3	research ability to unilaterally videotape conditions of work .3
6/10/2014	MD	1.5	md drafting response to motion to compel discovery from all plaintiffs 1.5
6/10/2014	JP	1.5	jp/kw examine and analyze documents produced by Kellogg to determine content, import on litigation and add results to document production Excel spreadsheet
6/10/2014	MD	0.2	md/dg discussing legal and practical issues surrounding videotaping clients performing work and defendants good faith defense/waive of atty/client privilege 0.2
6/10/2014	KW	0.2	jp/kw confer regarding which plaintiffs with whom we could discuss possible videotape .2

Date	Staff	Amount of Time	Description
6/10/2014	MR	0.1	email 30b6 notice to para JP and KW
6/10/2014	DG	0.7	draft further interrogatories re good faith .5; review JB's emails re good faith info .1; review JB's emails re dismissal of opt-ins for SOL grounds .1
6/10/2014	DG	0.2	md/dg discussing legal and practical issues surrounding videotaping clients performing work and defendants good faith defense/waive of atty/client privilege 0.2
6/10/2014	MD	0.4	md/mr discussing documents/exhibits needed for 30b6 ESI deposition 0.4
6/10/2014	KW	1.5	jp/kw examine and analyze documents produced by Kellogg to determine content, import on litigation and add results to document production Excel spreadsheet
6/10/2014	MR	0.4	md/mr discussing documents/exhibits needed for 30b6 ESI deposition 0.4
6/10/2014	KW	0.4	review defendant produced documents to find section(s) which may impact possibility of videotaping current plaintiff employees at work .2 highlight relevant sections and produce for litigation team review .2
6/10/2014	KW	0.3	JP/MR discuss needs for upcoming 30b6 depo
6/10/2014	DG	1.1	legal research on good faith and whether it waives atty/cl privilege in 9th Cir 1; email to local counsel re any local decisions re same .1
6/10/2014	MR	0.3	JP/MR discuss needs for upcoming 30b6 depo
6/10/2014	MD	0.2	md write defense counsel request for documents from Murry litigation 0.2
6/11/2014	AG	0.2	contact TSG regarding exhibit for deposition
6/11/2014	MD	0.2	md/dg discussing representative discovery, defendants request to dismiss opt-ins past the SOL, and defendant's response re Murry litigation documents 0.2
6/11/2014	MD	0.3	md preparing for meet and confer with defense counsel 0.3
6/11/2014	MD	0.1	md call with defense counsel about documents from Murry case, opt-ins past SOL, and discovery of all opt-ins 0.1
6/11/2014	KW	1.3	download CDs of discovery data produced by defendant .4 review, organize and label for efficient access by litigation team .9
6/11/2014	MD	0.2	md emailing defense counsel about Murry documents 0.2
6/11/2014	KW	0.1	mr/kw review discovery production of defendant to determine documents requiring DT Search
6/11/2014	MR	0.1	discuss with paras KW and JP questions about time studies and consultant (their time entered separately)
6/11/2014	MD	0.2	md drafting email to defense counsel about equitable tolling 0.2
6/11/2014	MR	0.1	examine Def document sent in email from para JP
6/11/2014	KW	0.8	dg/md/jp/mr/kw litigation team meeting: review discovery produced; discuss additional, clarifying discovery needed; discuss process for representative discovery of plaintiffs/opt-ins; discuss litigation strategy
6/11/2014	KW	0.1	jp/kw discussion of how best to respond to plaintiff's age discrimination allegations against Kellogg
6/11/2014	CLER	0.2	create PDF Format of correspondence recd from D. ( CD containing documents KELLOGG-050795-052492, KELLOGG 052493-054541 and KELLOGG 054542-057898)
6/11/2014	JP	0.8	dg/md/jp/mr/kw litigation team meeting: review discovery produced; discuss additional, clarifying discovery needed; discuss process for representative discovery of plaintiffs/opt-ins; discuss litigation strategy
6/11/2014	DG	0.8	dg/md/jp/mr/kw litigation team meeting: review discovery produced; discuss additional, clarifying discovery needed; discuss process for representative discovery of plaintiffs/opt-ins; discuss litigation strategy
6/11/2014	MR	0.8	dg/md/jp/mr/kw litigation team meeting: review discovery produced; discuss additional, clarifying discovery needed; discuss process for representative discovery of plaintiffs/opt-ins; discuss litigation strategy



Date	Staff	Amount of Time	Description
6/11/2014	MD	0.8	dg/md/jp/mr/kw litigation team meeting: review discovery produced; discuss additional, clarifying discovery needed; discuss process for representative discovery of plaintiffs/opt-ins; discuss litigation strategy
6/11/2014	MR	2.6	install dtsearch on backup server .3, run dtsearch indexing on Kellogg production 3, continued web research regarding Quofores .2, install abode on backup server to read kellogg pdf documents .3, perform initial keyword search on Kellogg production using dtsearch 1.5
6/11/2014	MR	0.1	review 30b6 notice to make sure that time studies were included as topic
6/11/2014	JP	0.1	jp/kw discussion of how best to respond to plaintiff's age discrimination allegations against Kellogg
6/11/2014	KW	0.2	read the legal research related to videotaping plaintiffs at work and discoverability of the product .3
6/11/2014	MD	0.5	md drafting interrogatory and document requests 0.5
6/11/2014	MR	0.3	KW/MR discuss information need for Kellogg depo .2, discuss Kellogg general case handling .1
6/11/2014	KW	2.7	JP/KW read and analyze each document of discovery produced by defendant to complete annotated discovery production outline for efficient use and access by litigation team
6/11/2014	DG	0.3	md/dg discussing representative discovery, defendants request to dismiss opt-ins past the SOL, and defendant's response re Murry litigation documents 0.2; edit letter to JB re holding off on further production of personnel files .1
6/11/2014	MD	0.8	md drafting letter to defense counsel about representative discovery 0.8
6/11/2014	MD	0.5	md reviewing kellogg discovery production 0.5
6/11/2014	JP	2.7	JP/KW read and analyze each document of discovery produced by defendant to complete annotated discovery production outline for efficient use and access by litigation team
6/11/2014	DG	0.2	dg/mr discuss IT deposition needs .2
6/11/2014	DG	0.2	review draft request to produce re good faith .1; review draft interrogatories re same .1
6/11/2014	MD	0.1	md call defense counsel to discuss production of personnel files 0.1
6/11/2014	MD	0.1	md/kw discuss corrupted file of document production from defense counsel 0.1
6/11/2014	MR	0.2	dg/mr discuss IT deposition needs .2
6/11/2014	DG	0.6	md/dg discussing edits to interrogatories regarding Kellogg's good faith defense 0.1; edit letter to Kellogg re individual discovery .5
6/11/2014	KW	0.3	KW/MR discuss information need for Kellogg depo .2, discuss Kellogg general case handling .1
6/11/2014	MD	0.1	md/dg discussing edits to interrogatories regarding Kellogg's good faith defense 0.1
6/11/2014	MD	0.2	md drafting email to defense counsel about production of personnel files 0.2
6/12/2014	MD	0.2	md reviewing emails from defense counsel about conflicting bates stamped documents 0.2
6/12/2014	MD	0.2	md researching time efficiency and reading case study on Kellogg's supply chain 0.2
6/12/2014	MR	0.3	read various emails and look at referenced documents relating to Def production relevant to upcoming ESI depo
6/12/2014	MD	0.1	md editing letter re request for documents 0.1
6/12/2014	MR	0.5	copy dtsearch index of production to external hard drive
6/12/2014	MD	0.2	md/mr discussing topics to cover during 30b6 ESI deposition and documents to request regarding time studies 0.2

Date	Staff	Amount of Time	Description
6/12/2014	MD	0.1	md/mr discussing amending 30b6 ESI deposition to discuss supply chain 0.1
6/12/2014	JP	0.1	jp/kw discuss results of fact finding interview with [client]; determine next steps .1
6/12/2014	CLER	0.1	create PDF Format of correspondence recd from D. ( CD containing documents KELLOGG-057899-059982 and KELLOGG 059983-060065)
6/12/2014	MR	0.1	md/mr discussing amending 30b6 ESI deposition to discuss supply chain 0.1
6/12/2014	KW	0.1	jp/kw discuss results of fact finding interview with [client]; determine next steps .1
6/12/2014	MR	0.2	md/mr discussing topics to cover during 30b6 ESI deposition and documents to request regarding time studies 0.2
6/12/2014	DG	0.1	edits to letter to Boudreau re discovery of 1000 opt ins .1
6/12/2014	MD	1.2	md drafting follow up document demands on consultant advice/analysis re job duties/compensation 1.2
6/12/2014	KW	0.5	fact finding interview with named plaintiff [ ] about facts and fact verification of primary job duty and hours worked .4 add information to case notes .1
6/12/2014	KW	0.5	jp/kw determine most effective way to move ahead on pursuing litigation strategy of videotaping .3 discuss and determine plaintiffs to interview regarding videotaping issues .2
6/12/2014	MD	0.4	md/kw meet to resolve discrepancies and duplicate Bates numbers in defendant's document production .4
6/12/2014	MD	0.5	md/kw analyze documents provided regarding Kellogg reorganization and compensation plan changes in 2010 and years following to determine discovery needed .2 frame categories and wording for additional discovery requests .2 determine additional information needed from documents provided to determine what is missing .1
6/12/2014	KW	0.3	research defendant's discovery production to find documents relating to time-motion metrics to reference in follow-up discovery request .2 email with comment re background information needed to attorney .1
6/12/2014	MD	0.1	md email defense counsel letter re representative discovery 0.1
6/12/2014	KW	0.4	md/kw meet to resolve discrepancies and duplicate Bates numbers in defendant's document production .4
6/12/2014	MD	0.4	md reviewing edits to letter re representative discovery and conducting legal research re fluctuating workweek 0.4
6/12/2014	CLER	0.2	prepare welcome ltr to new client
6/12/2014	CLER	0.1	Data Entry of contact information of client
6/12/2014	KW	0.2	review latest discovery request to be sent to Kellogg for completeness and possible suggestions .2
6/12/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/12/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#251 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Kara Carper.)(Dunn, Matt)
6/12/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Kara Carper.)
6/12/2014	KW	0.5	md/kw analyze documents provided regarding Kellogg reorganization and compensation plan changes in 2010 and years following to determine discovery needed .2 frame categories and wording for additional discovery requests .2 determine additional information needed from documents provided to determine what is missing .1
6/13/2014	MD	0.2	md researching Kellogg's supply chain for amending 30b6 ESI notice 0.2
6/13/2014	MD	0.2	md prepare for discovery conference with defense counsel 0.2

Date	Staff	Amount of Time	Description
6/13/2014	MD	0.1	md/dg/mr discussing amending 30b6 ESI notice 0.1
6/13/2014	MR	0.1	md/dg/mr discussing amending 30b6 ESI notice 0.1
6/13/2014	DG	0.1	md/dg/mr discussing amending 30b6 ESI notice 0.1
			read prior saved documents and new web research regarding Kellogg Supply Chain
6/13/2014	MR	0.6	Management
6/13/2014	MD	0.5	md parpticate on discovery status conference with defense counsel 0.5
6/13/2014	MR	0.1	revise MD's email to Def Counsel amending notice
6/13/2014	DG	0.1	review discovery letter re consultants' reports and docs re same .1
6/13/2014	MD	0.1	md send amended 30b6 ESI notice to defense counsel 0.1
6/13/2014	MD	0.2	md amending 30b6 ESI notice 0.2
6/15/2014	MR	2.4	research for prep of forthcoming ESI 30b6
6/16/2014	MD	0.5	md/mr discussing 30b6 ESI depositions and Kellogg's objections 0.5
6/16/2014	MR	0.5	md/mr discussing 30b6 ESI depositions and Kellogg's objections 0.5
			mr/kw discussion of IT systems of Kellogg in preparation for 30(b)(6) deposition on
6/16/2014	KW	0.3	Thursday
6/16/2014	JS	0.2	research illegible facsimiles recd over weekend--discern who sent and for what
			mr/kw discussion of IT systems of Kellogg in preparation for 30(b)(6) deposition on
6/16/2014	MR	0.3	Thursday
6/16/2014	MR	11.1	work on forthcoming ESI depo
			mr/kw discussion of IT systems used by Kellogg, disucssion of how to understand "Ping" system -required of plaintiffs when they reached an account discussion of discovery needed and best way to get at the issues of Kellogg contracts with stores for for shelf
6/16/2014	MR	0.4	space and class members order replensihment
			received consent to sue-which was not readable- follow-up research to contact putative class member to clarify consent form .3 telephone call to putative class member to
6/16/2014	KW	0.4	clarify information needed .1
			research information firm to represent plaintiff [ ] regarding age discrimination .1 email
6/16/2014	KW	0.2	information to [ ] in response to his email regarding allegation of age discrimination .1
			mr/kw discussion of IT systems used by Kellogg, discussion of how to understand "Ping" system -required of plaintiffs when they reached an account discussion of discovery needed and best way to get at the issues of Kellogg contracts with stores for for shelf
6/16/2014	KW	0.4	space and class members order replensihment
			md/mr/jp/kw litigation team meeting analyzing ESI data, documents and information needed from ESI deposition discuss defendant's responses to ESI 30(b)(6) depostion notice discuss ESI deposition outline, add points as needed determine and assign tasks
6/17/2014	KW	1.8	to prepare for ESI 30(b)(6) deposition
			dg/md/mr/jp/kw litigation team meting to review discovery produced and prepare for
6/17/2014	JP	0.9	30(b)(6) deposition
			dg/md/mr/jp/kw litigation team meting to review discovery produced and prepare for
6/17/2014	MD	0.9	30(b)(6) deposition
			dg/md/mr/jp/kw litigation team meting to review discovery produced and prepare for
6/17/2014	MR	0.9	30(b)(6) deposition
6/17/2014	DG	1.1	review docs for IT deposition 1.1

Date	Staff	Amount of Time	Description
6/17/2014	MD	1.8	md/mr/jp/kw litigation team meeting analyzing ESI data, documents and information needed from ESI deposition discuss defendant's responses to ESI 30(b)(6) deposition notice discuss ESI deposition outline, add points as needed determine and assign tasks to prepare for ESI 30(b)(6) deposition
6/17/2014	JP	1.8	md/mr/jp/kw litigation team meeting analyzing ESI data, documents and information needed from ESI deposition discuss defendant's responses to ESI 30(b)(6) deposition notice discuss ESI deposition outline, add points as needed determine and assign tasks to prepare for ESI 30(b)(6) deposition
6/17/2014	MD	0.1	md contacting plaintiff about settlement 0.1
6/17/2014	MR	0.7	add'l work on ESI depo outline .5, email ESI depo outline to attys .1, email about mtg to prep for ESI depo .1,
6/17/2014	MD	0.3	md drafting questions/issues to cover for ESI deposition 0.3
6/17/2014	MD	0.1	md forwarding ESI deposition contact info to KW for follow up on exhibits 0.1
6/17/2014	MD	0.1	md/dg discussing meeting re 30b6 ESI deposition notice 0.1
6/17/2014	MR	5	work on 30b6deposition prep/outline
6/17/2014	MR	1.8	md/mr/jp/kw litigation team meeting analyzing ESI data, documents and information needed from ESI deposition discuss defendant's responses to ESI 30(b)(6) deposition notice discuss ESI deposition outline, add points as needed determine and assign tasks to prepare for ESI 30(b)(6) deposition
6/17/2014	JS	0.3	process and copy kellogg DEF production materials; eml MD, KW, DG
6/17/2014	MD	1	md drafting motion re representative discovery 1.0
6/17/2014	MD	0.4	md/mr discussing 30b6 ESI deposition and how to prove that Plaintiffs are not outside sales employees 0.4
6/17/2014	DG	0.9	dg/md/mr/jp/kw litigation team meeting to review discovery produced and prepare for 30(b)(6) deposition
6/17/2014	DG	0.3	md/mr discussing topics / issues to cover during 30b6 esi deposition, including MD participation 0.3
6/17/2014	MD	0.3	md/mr discussing topics / issues to cover during 30b6 esi deposition, including MD participation 0.3
6/17/2014	KW	0.3	respond to putative class members questions regarding filing a consent to sue form .2 assign information to case notes .1
6/17/2014	MR	0.4	md/mr discussing 30b6 ESI deposition and how to prove that Plaintiffs are not outside sales employees 0.4
6/17/2014	KW	0.9	dg/md/mr/jp/kw litigation team meeting to review discovery produced and prepare for 30(b)(6) deposition
6/17/2014	MD	0.1	md reading letter from defense counsel about representative discovery 0.1
6/18/2014	MD	0.1	md speaking with defense counsel about large excel files for IT deposition 0.1
6/18/2014	MD	0.6	dg/md/mr IT depo prep .6
6/18/2014	DG	0.6	dg/md/mr IT depo prep .6
6/18/2014	DG	4.7	dg/mr depo preparation 3.2; final doc review re K's business planning and how reps fit into that function 1.5
6/18/2014	MD	0.1	md emailing defense counsel about missing documents 0.1
6/18/2014	MR	0.6	dg/md/mr IT depo prep .6
6/18/2014	KW	0.2	md/kw review exhibits needed for 30(b)(6) IT deposition identify additional exhibits to be prepared
6/18/2014	KW	0.2	open case contact .1 scan consent to sue to prepare for ECF filing .1
6/18/2014	KW	0.2	download defendant's production of documents in response to PLT document demands .2
6/18/2014	MD	0.2	md compiling, reviewing, and sending exhibits to defense counsel for IT deposition 0.2

Date	Staff	Amount of Time	Description
6/18/2014	KW	0.3	print consent to sue form .1 scan into electronic file to prepare for filing .1 email conformation to [client] .1
6/18/2014	KW	0.6	Final review of exhibits prior to sending to stenographer .2 assemble 1 additional exhibit .1 use Send6 web based system to send exhibits in 2 batches to stenographer .3
6/18/2014	MR	6	add'l work on depo prep 1.0, preparation of exhibits for tomorrow's depo 5.0
6/18/2014	MD	0.1	md emailing defense counsel about information needed for 30b6 ESI deposition (location/call-in number) 0.1
6/18/2014	MD	0.2	md/kw discussing preparing exhibits for 30b6 IT deposition and sending to stenographer 0.2
6/18/2014	KW	0.4	dg/mr/jp/kw discussion of direct delivery supply management system and where plainitffs fit into this product delivery system .4
6/18/2014	MD	0.3	md compiling list of acronyms for various positions and providing description of plaintiffs job duties 0.3
6/18/2014	MD	0.2	md reviewing meet/confer notes for additional ESI issues to discuss during deposition 0.2
6/18/2014	KW	0.3	prepare exhibits and use defense counsel's secure document transfer system to email excel spreadsheet documents in 2 batches .3
6/18/2014	KW	0.1	md/kw discussing need for stenographer to provide laptop at deposition 0.1
6/18/2014	KW	0.2	md/kw discussing preparing exhibits for 30b6 IT deposition and sending to stenographer 0.2
6/18/2014	MD	0.1	md/kw discussing need for stenographer to provide laptop at deposition 0.1
6/18/2014	KW	1.1	exhibit review and preparation for 30(b)(6) ESI deposition 1.1
6/18/2014	MD	0.2	md/kw review exhibits needed for 30(b)(6) IT deposition identify additional exhibits to be prepared
6/18/2014	DG	0.2	dg/md/jp discuss issues for prep for IT depo .2
6/18/2014	JP	0.2	dg/md/jp discuss issues for prep for IT depo .2
6/18/2014	MD	0.2	dg/md/jp discuss issues for prep for IT depo .2
6/18/2014	MR	3.2	dg/mr depo preparation 3.2
6/19/2014	MR	8.6	dg/mr 30b6 IT deposition 9-5:30 w 1/2 hr break [depo prep during break .3] 8.3; prepare for deposition .3
6/19/2014	KW	0.2	complete ECF filing of Consent to Sue update docket
6/19/2014	DG	8.6	dg/mr 30b6 IT deposition 9-5:30 w 1/2 hr break [depo prep during break .3] 8.3; prepare for deposition .3
6/19/2014	MD	4	participating in ESI deposition (including acquiring documents for DG, providing questions, and taking notes )4.0
6/19/2014	MD	8.3	dg/mr 30b6 IT deposition 9-5:30 w 1/2 hr break [depo prep during break .3] 8.3
6/19/2014	MR	0.3	set up laptop and information for depo
6/19/2014	MD	3.7	md parpticiapte on deposition of IT person 3.7
6/19/2014	KW	0.2	complete ECF filing of Consent to Sue update docket
6/19/2014	MR	3.9	web research on issues raised by depo such as CRS, Quofores=O4, DSD vs Warehouse model, advantages of DSD model
6/19/2014	MR	0.2	put away laptop and paperwork after depo
6/20/2014	MD	0.2	md review list of outstanding discovery in preparation of meeting with defense counsel 0.2
6/20/2014	MD	0.5	md/mr discussing 30b6 ESI deposition and arguments against outside sales exemption 0.5
6/20/2014	MR	0.8	continued web research regarding willard bishop research reports
6/20/2014	MR	0.5	md/mr discussing 30b6 ESI deposition and arguments against outside sales exemption 0.5

Date	Staff	Amount of Time	Description
6/20/2014	MD	0.3	md editing motion to compel 0.3
6/20/2014	MD	1	md drafting email search protocol 1.0
6/20/2014	CM	0.1	report on pacer/tm reconciliation to JP (.1)
6/23/2014	KW	0.2	draft document preservation letter .1 process mailing to new palintiff .1
6/23/2014	CLER	0.1	create PDF format of correspondence recd from D. ( D. Objection to amended depo notice)
6/23/2014	KW	0.2	draft document preservation letter .1 process mailing to new palintiff .1
6/23/2014	KW	0.1	scan signed document preservation letter into electronic file .1
6/23/2014	MD	0.2	call with Mariana Gaxilola re discovery 0.2
6/23/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#254 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Pamela McKeldin)(Dunn, Matt)
6/23/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of Pamela McKeldin)
6/23/2014	KW	0.1	scan signed document preservation letter into electronic file .1
6/23/2014	KW	0.4	review and organize electronic document production produced by defendant .4
6/23/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#253 - NOTICE Of Filing Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Sandra Johnson, # (2) Consent to Sue of Kim Trowbridge)(Getman, Dan)
6/23/2014	MD	0.2	md reviewing cases concerning outside sales and kellogg's competitors re similar positions 0.2
6/23/2014	CLER	0.1	Data Entry of contact information of client
6/23/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
6/23/2014	CLER	0.2	prepare welcome ltr to new client
6/23/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#252 - PROPOSED ORDER (Unsigned) - Stipulated Protective Order. (Attachments: # (1) Proposed Order Red-line version pursuant to LCR 26(c))(Nelson, James)
6/23/2014	KW	0.4	print signed consent to sue inpreparation for filing.1 open case contact .1 email to plaintiff [ ] to schedule appointment for intake interview and verify phone number ,1
6/23/2014	KW	0.1	telephone call to schedule interview .1
6/23/2014	KW	0.1	update electronic file of Def. Correspondence
6/23/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#254 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Pamela McKeldin)(Dunn, Matt)
6/24/2014	MD	0.1	md review document re native documents kellogg produced 0.1
6/25/2014	JS	0.1	call for JP--forwarded to vm
6/25/2014	MR	0.3	assist KW in saving and opening Def production from FTP site (her time entered separately) .2, brief look at some of this production .1
6/25/2014	MD	2.5	md reviewing and preparing objections to Kellogg's discovery demands 2.5
6/26/2014	JP	0.3	draft email to all plaintiffs to provide case update and to establish contact with plaintiffs who are current employees; circulate to litigation team for approval .3
6/26/2014	KW	0.2	jp/kw read and revise reminder letter to non-responsive claimants .2
6/26/2014	MD	0.2	md review discovery for strategy meeting 0.2
6/26/2014	KW	0.3	fact finding interview with plainitff [ ] regarding primary work duties .2 add information to case notes .1



Date	Staff	Amount of Time	Description
6/26/2014	MR	0.9	dg/mf/jp/m/kw litigation team meeting to deal with discovery demand and production deficits
6/26/2014	KW	0.3	jp/kw review draft of supplemental discovery request regarding data of variable labor and plaintiffs .1 draft new language to reflect the data needed to support overtime claims and negate administrative exemption .2
6/26/2014	KW	0.4	mr/kw review and analyze variable labor spreadsheets produced by defendant to determine data provided .4
6/26/2014	MR	0.4	work out language for specific document request regarding TSR and PTM work hours
6/26/2014	MD	0.9	dg/mf/jp/m/kw litigation team meeting to deal with discovery demand and production deficits
6/26/2014	JP	0.9	dg/mf/jp/m/kw litigation team meeting to deal with discovery demand and production deficits
6/26/2014	DG	0.9	dg/mf/jp/m/kw litigation team meeting to deal with discovery demand and production deficits
6/26/2014	KW	0.9	dg/mf/jp/m/kw litigation team meeting to deal with discovery demand and production deficits
6/26/2014	MD	0.2	md editing objections to interrogatory requests 0.2
6/26/2014	MR	0.4	mr/kw review and analyze variable labor spreadsheets produced by defendant to determine data provided .4
6/26/2014	JP	0.3	jp/kw review draft of supplemental discovery request regarding data of variable labor and plaintiffs .1 draft new language to reflect the data needed to support overtime claims and negate administrative exemption .2
6/26/2014	KW	0.3	draft email to all plaintiffs to provide case update and to establish contact with plaintiffs who are current employees; circulate to litigation team for approval .3
6/27/2014	MD	0.4	md call with defense counsel about outstanding discovery 0.4
6/30/2014	KW	0.4	review excel spreadsheet of defendant's discovery requests to determine which named plaintiffs need to respond .2 read and notate list of documents requested to prepare for discussions with named plaintiffs .2
6/30/2014	KW	0.3	MD/KW review discovery demands as they apply to named plaintiffs from defendant .1 determine tasks going forward to meet 2 week deadline for production of responses and documents .2
6/30/2014	KW	0.3	research case files to determine which named plaintiffs have submitted documents to our office .1 research to determine which documents have been produced to defendant .1 prepare information for case litigation team meeting .1
6/30/2014	MD	0.2	md/dg discussing responses to defendants' discovery demands 0.2
6/30/2014	DG	0.7	md/dg discussing responses to defendants' discovery demands 0.2; edit objections to defendant request for production and interrogatories .5
6/30/2014	KW	0.5	discussion of defendant's RFPs and plaintiff's responses discussion of need for document search verify mailing address and email add information to case notes
6/30/2014	MD	0.1	md email defense counsel asking for extension of time for discovery demands 0.1
6/30/2014	AG	0.2	create FedEx label for client mailing of documents
6/30/2014	MD	1.5	md preparing document responses 1.5
6/30/2014	KW	0.2	telephone call to named plaintiff to schedule interview to discuss responses to defendant's RFPs email to named plaintiff to schedule interview to discuss responses to defendant's RFPs

Date	Staff	Amount of Time	Description
6/30/2014	MD	0.3	MD/KW review discovery demands as they apply to named plaintiffs from defendant .1 determine tasks going forward to meet 2 week deadline for production of responses and documents .2
6/30/2014	KW	0.3	telephone call to named plaintiff to schedule appointment for discussion of responses to defendants' discovery requests .1 email to named plaintiff to schedule appointment for discussion of responses to defendants' discovery requests .1 update case notes .1
7/1/2014	KW	0.1	research case notes to begin to find information needed to respond to defendant's discovery requests .1
7/1/2014	KW	0.1	research case notes to begin to find information needed to respond to defendant's discovery requests .1
7/1/2014	KW	0.1	research case notes to begin to find information needed to respond to defendant's discovery requests .1
7/1/2014	KW	0.1	research case notes to begin to find information needed to respond to defendant's discovery requests .1
7/1/2014	KW	0.1	research case notes to begin to find information needed to respond to defendant's discovery requests .1
7/1/2014	KW	0.1	research case notes to begin to find information needed to respond to defendant's discovery requests .1
7/1/2014	KW	0.2	write letter to explain documents to be sent, print and enclose FEDEX shipping label process mailing to named plaintiff [ ]
7/1/2014	KW	0.1	research case notes to begin to find information needed to respond to defendant's discovery requests .1
7/1/2014	MD	2.5	md drafting responses to interrogatories and requests to admit 2.5
7/1/2014	CLER	0.2	Transfer documents recd from Email system to docket file and create file copy(FINAL ASCIIs from the 6-19-2014 depositions of Mr. Young & Ms. Clifton
7/2/2014	KW	0.3	discussion with named plaintiff regarding responses to defendant's discovery demands ,3
7/2/2014	DG	0.6	litigation team meeting to review, discuss and draft beginning responses to defendant's discovery demand discussion of demand for medical records of named plaintiffs development of work plan to respond to discovery demands
7/2/2014	KW	0.3	telephone call to schedule appointment for fact finding interview to respond to defendant's discovery responses .1 email to schedule appointment for fact finding interview to respond to defendant's discovery responses .1 add information to case notes .1
7/2/2014	KW	0.3	jp/kw plan/assign tasks to be completed with each named plaintiff regarding response to Interrogatories, RFPs and Document requests
7/2/2014	MD	0.6	litigation team meeting to review, discuss and draft beginning responses to defendant's discovery demand discussion of demand for medical records of named plaintiffs development of work plan to respond to discovery demands
7/2/2014	JP	0.6	litigation team meeting to review, discuss and draft beginning responses to defendant's discovery demand discussion of demand for medical records of named plaintiffs development of work plan to respond to discovery demands
7/2/2014	KW	0.5	fact finding interview with named plaintiff to prepare to respond to defendant's discovery requests .3 email information to litigation team- .1 add informati to case notes .1
7/2/2014	KW	0.2	email to schedule appointment for fact finding interview to respond to defendant's discovery responses .1 add information to case notes .1
7/2/2014	KW	0.2	email to schedule appointment for fact finding interview to respond to defendant's discovery responses .1 add information to case notes .1
7/2/2014	JP	0.3	jp/kw plan/assign tasks to be completed with each named plaintiff regarding response to Interrogatories, RFPs and Document requests

Date	Staff	Amount of Time	Description
7/2/2014	MD	1.5	md preparing discovery responses 1.5
7/2/2014	MD	0.1	md/kw determine process for producing documents to defendant .1
7/2/2014	KW	0.1	md/kw determine process for producing documents to defendant .1
7/2/2014	KW	0.5	review plaintiff's objections to discovery requests to prepare to communicate and get needed information from named plaintiffs .3 determine which named plaintiffs have produced documents and which need to produce documents .1 prepare notes and questions for today's litigation team meeting .1
7/2/2014	KW	0.6	litigation team meeting to review, discuss and draft beginning responses to defendant's discovery demand discussion of demand for medical records of named plaintiffs development of work plan to respond to discovery demands
7/2/2014	KW	0.6	review defendant's discovery requests to identify named plaintiffs for whom we are producing discovery responses .6
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	MD	0.2	md/kw plan process to get completed discovery responses from each named plaintiff in a timely fashion .2
7/3/2014	KW	0.3	jp/kw reveiw and revise draft email providing case update to all plaintiffs explanation of discovery process and enquiry to current employees
7/3/2014	MD	0.1	md send defense counsel [client] documents 0.1
7/3/2014	KW	0.3	download discovery file related to lawsuit in California Superior Court .2 email hyperlink to litigation team for review .1
7/3/2014	KW	0.2	md/kw plan process to get completed discovery responses from each named plaintiff in a timely fashion .2
7/3/2014	MD	0.5	md reviewing discovery production 0.5
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	CLER	0.2	PCF Client (called to indicated that since she has join the case, they have been writing her up and threatening to terminate her. Prior to joining the case, she always has gotten A's in review and even recd an award for TSR of the Year. She would like to speak to someone for advice.
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	JP	0.3	jp/kw reveiw and revise draft email providing case update to all plaintiffs explanation of discovery process and enquiry to current employees
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	MD	0.1	md email defense counsel about missing documents 0.1
7/3/2014	KW	0.4	download latest production from defendant .4
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	KW	0.2	draft explanation email emailFEDEX shipping label
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	KW	0.2	draft explanation email emailFEDEX shipping label
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	MR	0.1	read atty MD email and email reply about store invoices

Date	Staff	Amount of Time	Description
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	KW	1	review documents sent by plaintiff to eliminate duplicates, organize and determine redaction needed .3 redact documents sent by plaintiff [ ] to prepare for production to defendnat .4 bates stamp documents for production to defendant .3
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/3/2014	KW	0.2	open document file. review, .1 add to electronic file of documents produced by defendant .1
7/6/2014	MR	0.1	email about variable labor data and [client] pdf
7/7/2014	KW	0.9	research each of 25 undeliverable emails to plaintiffs to determine correct email address to resend case update and contact information email
7/7/2014	KW	0.3	initial fact finding information call .2 add information to case notes .1
7/7/2014	KW	0.5	fact finding interview regarding injuries sustained at work and year long aftermath- .3 add information to case notes .1 email information to litigation team .1
7/7/2014	KW	0.3	fact finding telephone call regarding employment at Kellogg .2 add information to case notes .1
7/7/2014	KW	0.2	md/kw finalize plan and timeframe of getting and producing responses to defendant's discovery requests of named plaintiffs .2
7/7/2014	KW	0.2	scan discovery correspondence from defendant .1 update electronic file of discovery correspondence to facilitate litigation team tracking discovery production .1
7/7/2014	CLER	0.1	create PDF format of correspondence recd from D. ( D. responses to P. 1st set of request for Admission)
7/7/2014	KW	0.2	review CDs document production sent be defendant to eliminate duplications in production .2
7/7/2014	MD	0.2	md/kw finalize plan and timeframe of getting and producing responses to defendant's discovery requests of named plaintiffs .2
7/7/2014	KW	0.2	respond to emai from plaintiff .1 update contact information in electronic file .1
7/7/2014	JS	0.1	call for KW--notified kathy via eml and oral
7/7/2014	KW	0.4	download defendant's discovery production from internet .3 update electronic file of defendant produced documents .1
7/7/2014	KW	0.2	telephone call to plaintiff .1 add information to case notes .1
7/7/2014	MD	0.1	md/kw discuss what is needed for plaintiff to withdraw from lawsuit .1
7/7/2014	KW	0.6	Proof read case update for distribution to all opt-in plaintiffs process emailing case update to all opt-in plaintiffs correct email addresses as needed to complete email delivery
7/7/2014	KW	0.1	md/kw discuss what is needed for plaintiff to withdraw from lawsuit .1
7/7/2014	KW	0.2	respond to plaintiff's email re case progress .1 add information and update client contact information in case files .1
7/8/2014	KW	0.2	respond to questions from plaintiff regarding his claims and case progress .2
7/8/2014	KW	0.3	prepare discovery demands received from defendant for emailing to named plaintiffs draft cover email explaining discovery response process and timeframe email request to Admit, Document Request and Interrogatories to named Plaintiff [ ]

Date	Staff	Amount of Time	Description
7/8/2014	KW	0.3	prepare discovery demands received from defendant for emailing to named plaintiffs draft cover email explaining discovery response process and timeframe email request to Admit, Document Request and Interrogatories to named Plaintiff [ ]
7/8/2014	CLER	0.2	prepare welcome ltr to new client
7/8/2014	MD	0.3	MD/MR discuss [client] exhibit and Def variable labor reports
7/8/2014	KW	0.3	prepare discovery demands received from defendant for emailing to named plaintiffs draft cover email explaining discovery response process and timeframe email request to Admit, Document Request and Interrogatories to named Plaintiff [ ]
7/8/2014	KW	0.3	prepare discovery demands received from defendant for emailing to named plaintiffs draft cover email explaining discovery response process and timeframe email request to Admit, Document Request and Interrogatories to named Plaintiff [ ]
7/8/2014	KW	0.3	prepare discovery demands received from defendant for emailing to named plaintiffs draft cover email explaining discovery response process and timeframe email request to Admit, Document Request and Interrogatories to named Plaintiff [ ]
7/8/2014	MR	0.3	MD/MR discuss [client] exhibit and Def variable labor reports
7/8/2014	KW	0.3	prepare discovery demands received from defendant for emailing to named plaintiffs draft cover email explaining discovery response process and timeframe email request to Admit, Document Request and Interrogatories to named Plaintiff [ ]
7/8/2014	JP	0.4	JP/MR discuss and attempt to locate Def production of variable labor reports
7/8/2014	KW	0.3	prepare discovery demands received from defendant for emailing to named plaintiffs draft cover email explaining discovery response process and timeframe email request to Admit, Document Request and Interrogatories to named Plaintiff [ ]
7/8/2014	KW	1.5	fact finding interview to get plaintiff's responses to interrogatories and requests to admit
7/8/2014	DG	0.1	review emails re person for videotaping .1
7/8/2014	KW	0.6	fact finding interview with current Kellogg employee .4 add information to case notes .1 email information to litigation team .1
7/8/2014	KW	0.4	telephone discussion with putative class member regarding possible claims and possibility to file late consent to sue form .3 open case contact .1
7/8/2014	DG	0.4	edit answers to request to admit .4
7/8/2014	KW	0.3	telephone call to schedule fact finding interview .1 email to plaintiff to schedule fact finding interview .1 add information to case notes .1
7/8/2014	KW	0.2	md/kw review defendant's discovery requests to be sent named plaintiffs
7/8/2014	MR	0.4	JP/MR discuss and attempt to locate Def production of variable labor reports
7/8/2014	MD	0.2	md/kw review defendant's discovery requests to be sent named plaintiffs
7/9/2014	KW	0.2	update spreadsheet to be used by staff to relay case updae information to plaintiffs .2
7/9/2014	KW	0.3	respond to emails from plaintiffs regarding updated contact information and case update
7/9/2014	KW	0.4	telephone call to discuss defendant's discovery demands and to schedule an appoointment to draft PLT [ ]'s responses .1 send email re discovery responses .1 add information to case notes .1 add information to discovery tracking spreadsheet .1
7/9/2014	MD	0.1	md/kw discuss need and set meeting time to reveiw drft discovery responses

Date	Staff	Amount of Time	Description
7/9/2014	KW	0.4	MD/KW Review draft interrogatory responses of named plaintiff [ ] to determine additional information needed and information needing confirmation review Defendant's Requests to Admit responses of named plaintiff [ ] to determine additional information needed and information needing confirmation
7/9/2014	KW	0.3	jp/kw discussion of status of plan for video taping current Kellogg employee at work to show actual job duties Determine questions to be answered by litigation team before we can move forward.3
7/9/2014	JP	0.3	jp/kw discussion of status of plan for video taping current Kellogg employee at work to show actual job duties Determine questions to be answered by litigation team before we can move forward.3
7/9/2014	KW	0.1	md/kw discuss need and set meeting time to review draft discovery responses
7/9/2014	KW	0.2	telephone call to named plaintiff to schedule fact finding interview to inform responses to defendant's discovery responses .1 add information to spreadsheet tracking plaintiffs' production of discovery responses and documents
7/9/2014	KW	0.5	telephone call to discuss defendant's discovery demands and to schedule an appointment to draft PLT [ ]'s responses .2 draft email outlining document search needed .1 add information to case notes .1 add information to discovery tracking spreadsheet .1
7/9/2014	KW	0.5	review personnel file produced by defendant in preparation for drafting accurate response to defendant's discovery requests
7/9/2014	KW	0.8	review documents produced by defendant related to named plaintiff [ ] .6 select print materials needed to discuss during discovery response interview .2
7/9/2014	MD	0.4	MD/KW Review draft interrogatory responses of named plaintiff [ ] to determine additional information needed and information needing confirmation review Defendant's Requests to Admit responses of named plaintiff [ ] to determine additional information needed and information needing confirmation
7/9/2014	KW	0.1	update spreadsheet tracking named plaintiffs' discovery response process
7/9/2014	MR	0.3	review atty MD's email with payroll sample.1, write up various additional info we would need regarding payroll data .2
7/9/2014	AG	0.2	create FedEx label for client mailing of documents
7/9/2014	KW	1.9	fact finding interview to inform plaintiff's responses to Interrogatories and Request to Admit and Document Request
7/10/2014	KW	0.2	email response to opt-in who requests withdrawing his consent .1 add information to case notes
7/10/2014	KW	0.3	respond to email from plaintiff regarding document production .1 add documents to electronic file of plaintiff's documents for production to defendant .1
7/10/2014	KW	0.2	telephone call to respond to named plaintiff's request and need to schedule definite time for interview to inform responses to discovery email to lead paralegal regarding need to interview [client] and responses needed .1
7/10/2014	MD	1.5	md reviewing and preparing interrogatory and requests to admit responses 1.5
7/10/2014	KW	0.2	edit draft of discovery responses for attorney review .2
7/10/2014	JP	0.2	jp/kw discuss need for and plan for fact finding interviews of plaintiffs [ ] and [ ] to respond to defendant's discovery requests
7/10/2014	KW	0.2	jp/kw discuss need for and plan for fact finding interviews of plaintiffs [ ] and [ ] to respond to defendant's discovery requests



Date	Staff	Amount of Time	Description
			md/kw review draft responses to Interrogatories and requests to Admit of [ ], [ ], and [ ]- discuss and clarify responses as needed determine information to be confirmed in
7/10/2014	MD	0.5	documents produced by defendant and plaintiffs
7/10/2014	KW	0.1	schedule interview .1
7/10/2014	KW	1.3	fact finding interview to inform responses to discovery demands
7/10/2014	CLER	0.2	prepare welcome ltr to new client
7/10/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/10/2014	CLER	0.1	Data Entry of contact information of new client
			fact finding interview to inform responses to discovery requests .8 edit for attorney
7/10/2014	KW	1	review .2
			md/kw review draft responses to Interrogatories and requests to Admit of [ ], [ ], and [ ]- discuss and clarify responses as needed determine information to be confirmed in
7/10/2014	KW	0.5	documents produced by defendant and plaintiffs
7/10/2014	KW	1.3	fact finding interview to inform defendant's discovery demands 1.3
7/10/2014	KW	0.2	edit responses to discovery requests for attorney review .2
			ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of
7/10/2014	AG	0.1	Christopher Malatesta)
			Transfer documents recd from ECF system to docket file and create file copy(Docket#255 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
7/10/2014	CLER	0.1	Consent to Sue of Christopher Malatesta)(Dunn, Matt)
7/11/2014	MD	0.2	md/dg discussing state of discovery, and defendants discovery requests 0.2
7/11/2014	DG	0.2	md/dg discussing state of discovery, and defendants discovery requests 0.2
			go over request to admit and interrogatory with plaintiff 1.7; edit and incorporate
7/11/2014	JP	2	information provided .3
7/11/2014	MD	0.7	md call with defense counsel about document production 0.7
7/11/2014	AG	0.2	create FedEx label for client mailing of documents
			go over request to admit and interrogatory with plaintiff 1.5; edit and incorporate
7/11/2014	JP	2	information provided .3; email fedex label for plaintiff to ship documents .1
7/11/2014	MD	0.2	MD/MR discuss Kellogg payroll issues
7/11/2014	MR	0.2	MD/MR discuss Kellogg payroll issues
7/11/2014	MD	4	md preparing discovery responses and sending to clients and speaking with clients 4.0
7/11/2014	MD	0.3	md prepare for call with counsel re outstanding discovery 0.3
			review, download and save to electronic file 21 excel spreadsheets produced by
7/14/2014	KW	0.9	defendant
			prepare pdfs of signed interrogatories for production to defendant for plaintiff [ ]
7/14/2014	KW	0.2	prepare pdfs of signed Requests to Admit for production to defendant for [ ]
7/14/2014	CLER	0.4	organize documents for production to defendant .2 Bates stamp .2
			receive and prepare signed Interrogatories for [client] for production to defendant .1
7/14/2014	KW	0.2	receive and prepare signed Requests to Admit for [client] for production to defendant .1
			review documents emailed by named plaintiff [ ] .2 email hyperlink to attorney for
7/14/2014	KW	0.3	review to prepare for production in response to defendants discovery demands.1
7/14/2014	MD	0.2	md/kw review documents prior to scanning for production .2
			read and organize documents received from named plaintiff to prepare for production in
7/14/2014	CLER	1.1	response to demands from defendant scan documents

Date	Staff	Amount of Time	Description
7/14/2014	KW	0.6	Final review of documents sent by plaintiff [ ] .1 organize for Bates stamping .2 Bates stamp for production .3
7/14/2014	KW	0.2	receive and prepare signed Interrogatories for [client] for production to defendant .1 receive and prepare signed Requests to Admit for Soliman Sayedi for production to defendant .1
7/14/2014	KW	0.2	telephone call to named plaintiff to follow-up on final production of completed interrogatories and requests to admit- notate in case notes
7/14/2014	MA	0.1	call form client [ ]
7/14/2014	MD	1.5	md reviewing and preparing discovery responses from Named Plaintiffs 1.5
7/14/2014	JP	0.3	review work and progress in responding to defendant's interrogatories and requests to admit .2 determine tasks to be completed today .1
7/14/2014	KW	0.3	review work and progress in responding to defendant's interrogatories and requests to admit .2 determine tasks to be completed today .1
7/14/2014	KW	0.6	telephone calls to each named plaintiff to follow-up on getting signed Interrogatories and Requests to Admit .6
7/14/2014	KW	0.5	telephone call to plaintiff [ ] to discuss Responses to defendant's discovery demands .2 discussion of documents to produce .1 scan signed Interrogatory responses .1 scan signed Requests to Admit .1
7/14/2014	KW	0.2	md/kw review documents prior to scanning for production .2
7/14/2014	MD	0.1	md/dg discussing response to Kellogg about need for depositions 0.1
7/14/2014	MD	2.0	2 md reviewing Plaintiffs' discovery production and sending to defense counsel 2.0
7/15/2014	MR	0.6	dg/md/mr/jp/kw litigation team meeting to discuss need for defendant to produce information regarding TMs in CA, corporate contracts and account executive functions discussion of litigation strategy -what we need to do to demonstrate primary job duty to a jury
7/15/2014	JP	0.6	dg/md/mr/jp/kw litigation team meeting to discuss need for defendant to produce information regarding TMs in CA, corporate contracts and account executive functions discussion of litigation strategy -what we need to do to demonstrate primary job duty to a jury
7/15/2014	MD	0.6	dg/md/mr/jp/kw litigation team meeting to discuss need for defendant to produce information regarding TMs in CA, corporate contracts and account executive functions discussion of litigation strategy -what we need to do to demonstrate primary job duty to a jury
7/15/2014	CLER	0.7	jp/mr/kw review documents sent by named plaintiff [ ] to identify documents related to complaint-primary job duty and hours worked per week organize documents for scanning and production to defendant
7/15/2014	DG	0.4	prepare [questions] for clients .4
7/15/2014	DG	0.6	dg/md/mr/jp/kw litigation team meeting to discuss need for defendant to produce information regarding TMs in CA, corporate contracts and account executive functions discussion of litigation strategy -what we need to do to demonstrate primary job duty to a jury
7/15/2014	MD	0.2	md/kw review of status of production plaintiffs' responses to discovery demands- determine work still needed- discussion of preparing for deposition schedule
7/15/2014	KW	0.3	telephone call to plaintiff [ ] regarding documents to produce in response to defendant's discovery request .1 email to plaintiff [ ] regarding attempts to track document shipment .1 use FEDEX website to track documents to estimate timeframe for production .1

Date	Staff	Amount of Time	Description
7/15/2014	KW	0.6	dg/md/mr/jp/kw litigation team meeting to discuss need for defendant to produce information regarding TMs in CA, corporate contracts and account executive functions discussion of litigation strategy -what we need to do to demonstrate primary job duty to a jury
7/15/2014	KW	0.1	update spreadsheet tracking responses to discovery by named plaintiffs
7/15/2014	KW	0.3	redact faxing information from discovery responses .1 scan Interrogatory responses .1 scan responses to Requests to Admit .1
7/15/2014	MD	0.2	md writing defense counsel about depositions 0.2
7/15/2014	CLER	0.7	jp/mr/kw review documents sent by named plaintiff [ ] to identify documents related to complaint-primary job duty and hours worked per week organize documents for scanning and production to defendant
7/15/2014	MD	0.2	md corresponding with client about interrogatory and RTA responses 0.2
7/15/2014	KW	0.3	initial contact to get basic information .2 add information to case notes .1
7/15/2014	CLER	0.7	jp/mr/kw review documents sent by named plaintiff [ ] to identify documents related to complaint-primary job duty and hours worked per week organize documents for scanning and production to defendant
7/15/2014	DG	0.1	md/dg discussing discovery responses 0.1
7/15/2014	KW	0.3	redact faxing information from discovery responses .1 scan Interrogatory responses .1 scan responses to Requests to Admit .1
7/15/2014	MD	0.1	md/dg discussing discovery responses 0.1
7/15/2014	KW	0.9	mr/kw review, sort, organize and discuss import of documents sent by plaintiff [ ] prepare organized packets for scanning into electronic file
7/15/2014	KW	0.2	md/kw review of status of production plaintiffs' responses to discovery demands- determine work still needed- discussion of preparing for deposition schedule
7/15/2014	KW	0	email to plaintiff regarding document production .1
7/15/2014	KW	0.1	email to plaintiff regarding document production .1
7/16/2014	KW	0.3	review, label and update electronic file of documents from plaintiff [ ] to prepare for Bates stamping and production to defendant
7/16/2014	JP	2.6	jp/mr/kw review, organize, documents sent by plaintiff [ ] discuss and determine information relevant and important to supporting plaintiffs' claims prepare material for scanning into electronic file
7/16/2014	MR	2.6	jp/mr/kw review, organize, documents sent by plaintiff [ ] discuss and determine information relevant and important to supporting plaintiffs' claims prepare material for scanning into electronic file
7/16/2014	MD	0.2	md/kw review discovery to be produced today .1 plan timeframe for completion of production of responses to defendant's discovery demands .1
7/16/2014	JP	1.3	jp/kw develop sample test questionnaire for [questions] of all opt-ins in Thomas v Kellogg
7/16/2014	MD	1	md collecting discovery requests from 30b6 ESI deposition 1.0
7/16/2014	KW	2.6	jp/mr/kw review, organize, documents sent by plaintiff [ ] discuss and determine information relevant and important to supporting plaintiffs' claims prepare material for scanning into electronic file
7/16/2014	MR	0.8	JP/MR examine in depth client document labeled budget buster
7/16/2014	JP	0.8	JP/MR examine in depth client document labeled budget buster
7/16/2014	KW	0.2	md/kw review discovery to be produced today .1 plan timeframe for completion of production of responses to defendant's discovery demands .1
7/16/2014	MD	0.1	MD/MR discuss draft ESI protocol
7/16/2014	MD	0.1	MD/MR discuss need for labor reports after year 2010

Date	Staff	Amount of Time	Description
7/16/2014	KW	0.7	JLP/KW/MA meet to create [questions] to send to opt-ins in order to gather information from class
7/16/2014	JP	0.7	JLP/KW/MA meet to create [questions] to send to opt-ins in order to gather information from class
7/16/2014	MR	0.1	MD/MR discuss draft ESI protocol
7/16/2014	MD	0.2	md/kw plan for scanning and document production for named plaintiffs [ ] and [ ] .2
7/16/2014	CLER	3.5	Scan Documents
7/16/2014	CLER	1.1	create PDF format of documents recd by client for discovery
7/16/2014	MA	0.7	JLP/KW/MA meet to create [questions] to send to opt-ins in order to gather information from class
7/16/2014	KW	0.2	md/kw plan for scanning and document production for named plaintiffs [ ] and [ ] .2
7/16/2014	KW	0.4	prepare named plaintiffs' signed interrogatory responses for production to defendant - for Plaintiffs [ ] and [ ] .4
7/16/2014	MR	1.1	update dtsearch index for kellogg production .3, search on keywords "incremental" and "budget buster" and review results .8
7/16/2014	MR	0.1	MD/MR discuss need for labor reports after year 2010
7/16/2014	MD	0.6	md drafting letter to defense counsel about representative discovery 0.6
7/16/2014	MA	0.2	testing Kellogg client [questions] to provide responses feedback to JLP and KW
7/16/2014	MD	0.1	md emailing counsel about depositions 0.1
7/16/2014	KW	1.3	jp/kw develop sample test questionnaire for [questions] of all opt-ins in Thomas v Kellogg
7/17/2014	MD	0.1	md reading and responding to J. Leighton's staff re motions filed as letters 0.1
7/17/2014	MR	0.7	research kellogg brand valuation .6; email to attys/para .1
7/17/2014	MD	0.1	md emailing defense counsel about discussing discovery of opt-ins 0.1
7/17/2014	MD	0.2	md correspoding with dg about discovery issues with defense counsel 0.2
7/17/2014	JP	0.1	JP/MR discuss where to file case info regarding Kellogg brand valuation
7/17/2014	MD	1.5	md reviewing clients documents for production 1.5
7/17/2014	MR	0.1	JP/MR discuss where to file case info regarding Kellogg brand valuation
7/17/2014	JS	0.2	call re termination
7/17/2014	JS	0.4	send production docs via Send6 to related parties
7/17/2014	JS	0.4	bates stampd [client] docs
7/17/2014	MD	0.1	md reviewing kellogg deposition notices 0.1
7/17/2014	JP	0.6	review facts of firing for retaliation concerns
7/17/2014	JS	0.4	bates stamping plt production
7/17/2014	MD	0.5	md calling and speaking with clients about depositions 0.5
7/17/2014	MD	0.1	md/js discussing bates stamping documents for production 0.1
7/17/2014	MD	0.3	md responding to kellogg's attorney re deposition schedule 0.3
7/17/2014	CLER	2.1	create PDF format of documents recd by client for discovery
7/17/2014	MD	0.1	md calling defense counsel about depositions 0.1
7/18/2014	MD	0.1	md correspond with defense counsel about outstanding discovery 0.1
7/18/2014	MD	0.1	md call defense counsel about discovery 0.1
7/18/2014	CLER	1.5	create PDF format of documents recd by client for discovery
7/18/2014	JP	1.2	call to discuss issues around possible retaliaton by Kellogg
7/18/2014	MD	0.1	md coordinate with MA for production of named plaintiff's documents 0.1
7/18/2014	MA	0.1	md coordinate with MA for production of named plaintiff's documents 0.1
7/18/2014	MD	0.1	md coordiante with JS for bates stamping Named Plaintiffs' documents 0.1
7/18/2014	MD	1.5	md review discovery production to defense counsel from Named Plaintiff [ ] 1.5

Date	Staff	Amount of Time	Description
7/18/2014	MD	0.2	md prepare for meet and confer with defense counsel 0.2
7/18/2014	JS	0.1	md coordinate with JS for bates stamping Named Plaintiffs' documents 0.1
7/18/2014	JP	0.2	email update in response to voice message request
7/18/2014	MD	0.3	md asserting objections to additional discovery of additional opt-ins 0.3
7/18/2014	MD	0.2	md reviewing local civil rules about deadline to object to deposition dates 0.2
7/18/2014	MD	0.1	md meet and confer with defense counsel about representative discovery 0.1
7/21/2014	KW	0.2	js/kw discuss file organization and location of produced materials
7/21/2014	CLER	0.2	organize and file hard copies of plaintiff produced documents .2
7/21/2014	KW	0.4	review pdfs of documents received from plaintiffs in response to defendant's discovery requests .2 copy documents and prepare for attorney review and Bates stamping .4
7/21/2014	MD	0.4	md/kw review PLT production to defendant in response to discovery demands .1 Review production to be completed .2 review pages to be discussed with plaintiffs to determine if notes are communication to attorney and redaction is needed .1
7/21/2014	KW	0.2	meet with clerical staff, Z. Getman-Pickering to outline scanning work to be completed .2
7/21/2014	JS	0.2	js/kw discuss status of plt production--file location(s)
7/21/2014	KW	0.2	js/kw discuss status of plt production--file location(s)
7/21/2014	KW	0.2	js/kw discuss status of plt production--file location(s)
7/21/2014	KW	0.4	md/kw review PLT production to defendant in response to discovery demands .1 Review production to be completed .2 review pages to be discussed with plaintiffs to determine if notes are communication to attorney and redaction is needed .1
7/21/2014	JS	0.2	js/kw discuss file organization and location of produced materials
7/21/2014	KW	0.2	jp/kw discuss content of email cover to deposition notice and explanation to plaintiffs .1
7/21/2014	KW	0.2	discuss new case update information to circulate .1
7/21/2014	MD	0.2	md/jp/kw confer regarding how to proceed to respond to deposition notices for PLTs: [ ], [ ], [ ] and [ ]
7/21/2014	JP	0.2	md/jp/kw confer regarding how to proceed to respond to deposition notices for PLTs: [ ], [ ], [ ] and [ ]
7/21/2014	JP	0.2	jp/kw discuss content of email cover to deposition notice and explanation to plaintiffs .1
7/21/2014	JP	0.2	discuss new case update information to circulate .1
7/21/2014	JS	0.2	js/kw discuss status of plt production--file location(s)
7/21/2014	MD	0.2	md/dg discussing Plaintiffs depositions 0.2
7/21/2014	DG	0.2	md/dg discussing Plaintiffs depositions 0.2
7/21/2014	KW	0.9	prepare documents sent by plaintiff [ ] for transmission to defendant .5 use Send6 to transmit documents .4
7/21/2014	KW	0.2	respond to request for information from plaintiff regarding signing separation agreement .1 add information to case notes .1
7/21/2014	CLER	0.2	organize and file hard copies of plaintiff produced documents .2
7/21/2014	KW	0.2	md/jp/kw confer regarding how to proceed to respond to deposition notices for PLTs: [ ], [ ], [ ] and [ ]
7/21/2014	KW	0.9	prepare documents sent by plaintiff [ ] for transmission to defendant .5 use Send6 to transmit documents .4
7/22/2014	KW	0.3	respond to plaintiff's questions regarding communications from our office .1 update client contact information .1 email information to case paralegal for emailing [questions] to opt-in .1

Date	Staff	Amount of Time	Description
7/22/2014	MD	0.4	md/kw review preparation of documents for produciton to defendant .2 discuss need for Privilege Log .1 review RFAs for Named Plaintiffs- [ ], [ ], [ ] and [ ] .1
7/22/2014	KW	0.4	md/kw review preparation of documents for produciton to defendant .2 discuss need for Privilege Log .1 review RFAs for Named Plaintiffs- [ ], [ ], [ ] and [ ] .1
7/22/2014	KW	0.3	Review scanned documents to prepare for redaction and production to defendant .3
7/22/2014	DG	0.2	ms/dg discuss the application of DOL opinion letter on primary duty as sales
7/22/2014	JP	1.3	jp/kw discuss and plan depostion staffing for noticed plaintiff depositions .9 reveiw, edit and send [questions] to current plaintiffs .4
7/22/2014	MD	0.1	md call to J. Boudreau about depositions 0.1
7/22/2014	KW	0.4	scan defendant's discovery demands to [ ], [ ], [ ], [ ] and [ ] .4
7/22/2014	KW	1.3	jp/kw discuss and plan deposition staffing for noticed plaintiff depositions .9 reveiw, edit and send [questions] to current plaintiffs .4
7/22/2014	MD	1.5	md drafting outline for motion for protective order 1.5
7/23/2014	KW	0.4	review documents that may need redaction to define questions needing answers by plaintifff .2 email to plaintiff [ ] with attachments of documents needing clarification - listing questions to be answered .2
7/23/2014	JP	0.1	jp/kw determine work needed to be accomplished to accommodate new deposition schedule .1
7/23/2014	MD	0.2	md/dg discussing bifurcating trial for liability and damages 0.2
7/23/2014	KW	0.1	md/kw discussion of materials, information, documents and data needed to collected for each deponent
7/23/2014	JP	1.4	dg/md/mr/jp/kw: litigation team meeting: review and analyze data produced by [questions] of plaintiffs discuss and determine prioities in discovery of plaintiffs determine discovery issues to be dealt with in Motion to Compel discuss and determine tasks for each team member-related to discovery, damages, plaintiffs' documentation and data crunching
7/23/2014	MD	0.1	md/kw discussion of materials, information, documents and data needed to collected for each deponent
7/23/2014	DG	1.4	dg/md/mr/jp/kw: litigation team meeting: review and analyze data produced by [questions] of plaintiffs discuss and determine prioities in discovery of plaintiffs determine discovery issues to be dealt with in Motion to Compel discuss and determine tasks for each team member-related to discovery, damages, plaintiffs' documentation and data crunching
7/23/2014	MR	1.4	dg/md/mr/jp/kw: litigation team meeting: review and analyze data produced by [questions] of plaintiffs discuss and determine prioities in discovery of plaintiffs determine discovery issues to be dealt with in Motion to Compel discuss and determine tasks for each team member-related to discovery, damages, plaintiffs' documentation and data crunching
7/23/2014	KW	0.5	telephone call to plaintiff [ ] to schedule deposition .1 add information to case notes .1 email information to litigation team .1 create spreadsheet to track deposition scheduling, deposition preparation and document production .2
7/23/2014	MD	1.4	dg/md/mr/jp/kw: litigation team meeting: review and analyze data produced by [questions] of plaintiffs discuss and determine prioities in discovery of plaintiffs determine discovery issues to be dealt with in Motion to Compel discuss and determine tasks for each team member-related to discovery, damages, plaintiffs' documentation and data crunching



Date	Staff	Amount of Time	Description
7/23/2014	KW	0.4	mr/kw discussion of how to access, use and process .pst files produced by defendant .2 discuss procedural details of videotaping plaintiffs at work .2
7/23/2014	KW	1.4	dg/md/mr/jp/kw: litigation team meeting: review and analyze data produced by [questions] of plaintiffs discuss and determine priorities in discovery of plaintiffs determine discovery issues to be dealt with in Motion to Compel discuss and determine tasks for each team member-related to discovery, damages, plaintiffs' documentation and data crunching
7/23/2014	KW	0.3	md/kw plan deposition schedule for last 2 weeks in Aug. as per attorney's discussion with defense counsel
7/23/2014	MA	0.1	call from client [ ]
7/23/2014	JS	0.1	called for JLP, said would call back
7/23/2014	JP	0.3	review all retaliation proof in preparation for meeting with attorney .2; phone messages to client to discuss retaliation .1
7/23/2014	DG	0.2	md/dg discussing bifurcating trial for liability and damages 0.2
7/23/2014	KW	0.2	print severance agreement received from [client] to compare the language to previous severance agreements to verify language has not changed- save document to client .1 s electronic document file .1
7/23/2014	MD	0.3	md/kw plan deposition schedule for last 2 weeks in Aug. as per attorney's discussion with defense counsel
7/23/2014	KW	0.1	jp/kw determine work needed to be accomplished to accommodate new deposition schedule .1
7/23/2014	JP	0.3	MD/JP discuss retaliation claim of plaintiff with plan on how to proceed
7/23/2014	MD	0.3	MD/JP discuss retaliation claim of plaintiff with plan on how to proceed
7/23/2014	MR	0.4	mr/kw discussion of how to access, use and process .pst files produced by defendant .2 discuss procedural details of videotaping plaintiffs at work .2
7/23/2014	KW	0.4	calendar depositions noticed by defendant for Plaintiffs: [ ], [ ], [ ], [ ] and [ ]
7/23/2014	DG	0.4	dg/ms discuss means of proving damages through representative testimony .4
7/23/2014	KW	0.2	telephone call to schedule deposition .1 add information to case notes
7/23/2014	KW	0.4	use software to convert defendant's RFAs for named plaintiffs to Word documents attempt to download zip files of defendant's document production- message says
7/23/2014	KW	0.3	corrupted
7/23/2014	MS	0.4	dg/ms discuss means of proving damages through representative testimony .4
7/23/2014	KW	0.5	jp/mr/kw review, select and analyze information gathered and presented by [ ] [questions] of plaintiffs to understand, use and present to litigation team meeting
7/23/2014	JP	0.5	jp/mr/kw review, select and analyze information gathered and presented by [ ] [questions] of plaintiffs to understand, use and present to litigation team meeting
7/23/2014	MR	0.5	jp/mr/kw review, select and analyze information gathered and presented by [ ] [questions] of plaintiffs to understand, use and present to litigation team meeting
7/24/2014	MD	0.3	md call with Boudreau about depositions 0.3
7/24/2014	MD	0.2	md call with client about deposition schedule 0.2
7/24/2014	MD	2.0	md drafting motion for protective order re depositions 2.0
7/24/2014	KW	0.5	use [ ] data and Time Matters contact information to create contact spreadsheet of plaintiffs who have calendars and other time records of hours worked

Date	Staff	Amount of Time	Description
7/24/2014	KW	0.4	use [ ] data and Time Matters contact information to create contact information spreadsheet of plaintiffs who are current Kellogg employees and not on disability
7/24/2014	MD	0.2	md/kw -review deposition scheduling -to plan calendar for September .1 review combining and resending of production by Kellogg to understand what needs to be downloaded and added to discovery produced file .1
7/24/2014	KW	0.3	research email addresses for additional current employees of Kellogg to send an informational email .2 add email addresses to tracking spreadsheet .1
7/24/2014	KW	0.7	begin to review documents sent by named plaintiff in response to defendant's discovery demands .7
7/24/2014	MA	0.4	MA/KW work on using [ ] program to filter for plaintiffs still working at Kellogg and plaintiffs who have calendars and records of work hours
7/24/2014	KW	0.2	respond to plaintiff's questions about [questions] completion .1 add information to case notes
7/24/2014	KW	1.5	MR/KW work on downloading documents sent by defendant through secure website review and analyze variable labor reports to determine what information is presented; how it impacts this litigation, what information was not provided and what questions do we need to formulate to get the needed information
7/24/2014	KW	0.4	MA/KW work on using [ ] program to filter for plaintiffs still working at Kellogg and plaintiffs who have calendars and records of work hours
7/24/2014	MR	1.5	MR/KW work on downloading documents sent by defendant through secure website review and analyze variable labor reports to determine what information is presented; how it impacts this litigation, what information was not provided and what questions do we need to formulate to get the needed information
7/24/2014	KW	0.1	respond to email questions from plaintiff regarding paperwork related to litigation
7/24/2014	KW	0.2	md/kw -review deposition scheduling -to plan calendar for September .1 review combining and resending of production by Kellogg to understand what needs to be downloaded and added to discovery produced file .1
7/24/2014	MA	0.2	Reviewing [questions] and responses to assist KW and JLP with analyzing data
7/24/2014	MR	0.2	MR/KW organize discovery files to be more efficiently accessible to litigation team .2
7/24/2014	AG	0.3	prepare form requesting transcripts (MINUTE ORDER SETTING TRIAL AND PRETRIAL DATES ; Jury Trial is set for 9/14/2015 at 09:00 AM in B Courtroom before Judge Ronald B. Leighton. Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 3/18/2015, Motions due by 10/14/2014, Discovery completed by 11/5/2014, Dispositive motions due by 2/6/2015, Attorney settlement conference to be held by 7/8/2015, 39.1 mediation to be completed by 9/4/2015, 39.1 Settlement Report due by 8/18/2015, Motions in Limine due by 8/10/2015, Pretrial Order due by 8/28/2015, Pretrial Conference set for 9/2/2015 at 08:30 AM in B Courtroom before Judge Ronald B. Leighton. Trial briefs to be submitted by 8/28/2015, Proposed voir dire/jury instructions due by 8/28/2015. s/Jean Boring as authorized by Judge Ronald B. Leighton. (JAB)
7/24/2014	KW	0.2	MR/KW organize discovery files to be more efficiently accessible to litigation team .2
7/25/2014	MD	0.1	md/dg discussing Kellogg's motions regarding discovery from all opt-ins and briefing responsibility 0.1

Date	Staff	Amount of Time	Description
7/25/2014	MD	0.3	md coordinating plaintiffs deposition with defense counsel and confirming depositions as noticed were cancelled 0.3
7/25/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#256 - MOTION to Compel and Deem Requests Admitted by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Declaration of James M. Nelson ISO Defendants' Motions, # (2) Proposed Order) Noting Date 8/8/2014, (Nelson, James)
7/25/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#257 - MOTION to Compel Each Opt-In Plaintiffs' Responses to First Set of Interrogatories by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Proposed Order) Noting Date 8/8/2014, (Nelson, James)
7/25/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#258 - MOTION to Compel Each Opt-In Plaintiffs' Responses to First Set of Request for Production of Documents by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Proposed Order) Noting Date 8/8/2014, (Nelson, James)
7/25/2014	DG	0.1	md/dg discussing Kellogg's motions regarding discovery from all opt-ins and briefing responsibility 0.1
7/25/2014	JP	0.4	called to discuss being rehired and to find out if being in the case will impact that
7/25/2014	DG	0.4	review K's motion to deem requests to admit admitted .4
7/25/2014	JP	0.1	left message with plaintiff re her request to drop out of the case
7/25/2014	MD	0.2	md call with client about deposition scheduled 0.2
7/25/2014	JP	0.1	email client a requested update
7/25/2014	AG	0.3	create hard copies of D's MOTIONS to Compel for attorney's review (multiple copies)
7/25/2014	JP	0.5	called to let me know status of retaliation & discussed what she wants to do
7/25/2014	JP	0.4	called to give additional information requested from [questions]
7/27/2014	JP	0.1	respond to email with additional information about overtime hours worked
7/27/2014	JP	0.1	email update and confirm filing of cts
7/27/2014	JP	0.1	em and phone message re requesting to talk to her about her request to be withdrawn from case
7/28/2014	DG	0.1	dg/md discuss status of def's depo proposal re opt-ins and what to obj to .1
7/28/2014	MD	0.1	dg/md discuss status of def's depo proposal re opt-ins and what to obj to .1
7/28/2014	JP	0.3	called to review documents re hours worked as TSR
7/28/2014	KW	0.7	md/jp/kw review and discuss new depositions to be scheduled by defendant- plan schedule to meet deposition demands-- document production and review; deposition preparation, schedules and travel, and staffing
7/28/2014	KW	0.4	jp/kw reveiw documents sent by plaintiff [ ] to prepare for production to defendant .4
7/28/2014	JP	0.7	md/jp/kw review and discuss new depositions to be scheduled by defendant- plan schedule to meet deposition demands-- document production and review; deposition preparation, schedules and travel, and staffing
7/28/2014	MD	0.7	md/jp/kw review and discuss new depositions to be scheduled by defendant- plan schedule to meet deposition demands-- document production and review; deposition preparation, schedules and travel, and staffing

Date	Staff	Amount of Time	Description
			jp/kw discuss most efficient and effective way to memorialize important points and pages of documents from plaintiffs and defendants which support claims in this case .2
7/28/2014	KW	0.4	discuss work needed on documents from plaintiff [ ] .1 plan work to secure deposition dates for new opt-ins noticed by defendant- .1
7/28/2014	JP	0.1	called re how to send document for review
7/28/2014	JP	0.6	plaintiff called to discuss considering opting out of the case so she can be rehired
7/28/2014	MA	0.1	checking [ ] results to see if we have received [questions] from client Lee Nussbaum
7/28/2014	KW	0.1	respond to email from plaintiff [ ] .1
7/28/2014	JP	0.1	vm in response to his request for info
7/28/2014	CLER	0.6	create PDF format of documents recd from client
7/28/2014	JP	1.5	review and sort documents for scanning prep and to find case relevant documents
7/29/2014	JP	0.5	call re documents - did we have all his that he sent, reviewed hours worked in morning
7/29/2014	JP	0.5	foods given miles he had to drive
7/29/2014	JP	0.5	review severance agreement and send email that it does preclude him from continuing to get his claim thru this lawsuit
7/29/2014	KW	0.4	fact finding call to plaintiff [ ] regarding status of litigation .1 discussion of his employment status with Kellogg .1 draft confirming email to plaintiff .1 add information to case notes .1
7/29/2014	JS	0.1	call returning KW call
7/29/2014	KW	0.3	check severance agreement presented to plaintiff [ ] with previous severance agreement dated 4/13 to verify it is the same and that plaintiff is permitted to sign severance agreement and not forfeit FLSA rights draft memo to attorney .1
7/29/2014	CLER	2	Scan documents
7/29/2014	CLER	0.5	jp/kw review and organize documents sent by plaintiff to prepare for production in response to defendant's discovery demands .5
7/29/2014	CLER	0.5	jp/kw review and organize documents sent by plaintiff to prepare for production in response to defendant's discovery demands .5
7/29/2014	MR	0.4	copy new Def email production to two external drives from DVD
7/29/2014	KW	0.7	telephone discussion with plaintiff regarding litigation stages and deposition .4 add information to case notes .1 email to plaintiff to outline document production required .1 add information to tracking spreadsheet .1
7/29/2014	MA	0.1	call from client [ ] for Janice - took message
7/29/2014	KW	0.7	telephone discussion with plaintiff regarding litigation stages and deposition .4 add information to case notes .1 email information requiring follow-up to attorney .1 add information to tracking spreadsheet .1
7/29/2014	KW	0.2	respond to putative class member's request for information .1 add information to case notes .1
7/30/2014	KW	0.2	draft email to plaintiff [ ] explaining Kellogg had written that they understand and agree that signing a severance agreement does not interfere with FLSA claims add information to case notes .2
7/30/2014	AG	0.2	ag/kw discuss and resolve issues related to filing consent of [client] .2
7/30/2014	KW	0.2	research docket and consent to sue file to verify date of receipt of consent for [client] .2
7/30/2014	KW	0.2	draft email to named plaintiff [ ] regarding week to schedule deposition .1 add information to tracking spreadsheet .1

Date	Staff	Amount of Time	Description
7/30/2014	MD	1	md briefing section regarding requests to admit in response to Kellogg's motion to compel 1.0
7/30/2014	KW	0.2	draft email to plaintiff [ ] explaining Kellogg had written that they understand and agree that signing a severance agreement does not interfere with FLSA claims add information to case notes
7/30/2014	KW	0.5	email to litigation team re: details of financial loss experienced by plaintiffs when they are terminated and have participated in the Kellogg car purchase program .2 email to relay information from attorney's response to plaintiff [ ] .1 email to schedule fact finding appointment and get documentation .1 add information to case notes .1
7/30/2014	KW	0.2	draft email to named plaintiff [ ] regarding week to schedule deposition .1 add information to tracking spreadsheet .1
7/30/2014	CLER	1	Scan client documents
7/30/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Michael Walz)
7/30/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
7/30/2014	CLER	2	Scan documents
7/30/2014	CLER	0.1	Data Entry of contact information of new client
7/30/2014	CLER	0.2	prepare welcome ltr to new client
7/30/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#259 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Michael Walz)(Dunn, Matt)
7/30/2014	MD	0.5	dg.md/kw litigation team meeting to discuss progress and planning to respond to defendant's discovery requests and motions
7/30/2014	DG	0.5	dg.md/kw litigation team meeting to discuss progress and planning to respond to defendant's discovery requests and motions
7/30/2014	KW	0.6	dg.md/kw litigation team meeting to discuss progress and planning to respond to defendant's discovery requests and motions
7/30/2014	CLER	0.1	file documents sent by plaintiff .1
7/30/2014	KW	0.2	review case notes prior to calling plaintiff to discuss litigation and deposition notice .1
7/30/2014	MR	0.5	email to litigation team regarding plaintiff's concerns about retaliation .1
7/30/2014	KW	0.3	examine Def 2nd production of outlook pst files to confirm that dtsearch indexed correct number of email
7/30/2014	KW	0.2	telephone call to schedule discussion of deposition .1 email to confirm scheduling- add information to case notes
7/30/2014	KW	0.2	ag/kw discuss and resolve issues related to filing consent of [client] .2
7/31/2014	KW	0.5	review results of [questions] responses related to former Kellogg Account Executives to interview .2 create information memo of information provided by plaintiffs and forward to attorney .3
7/31/2014	KW	0.3	review status of confirmed and tentatively scheduled depositions .2 discuss issues to discuss in communications defense counsel related to deposition schedule .1
7/31/2014	KW	0.3	telephone call to PLT [ ] schedule deposition noticed by defendant .1 add information to case notes .1 add information to deposition tracking spreadsheet .1
7/31/2014	DG	0.4	read Killion v Kehe decision re OSE .4
7/31/2014	DG	0.3	dg/md edit keyword search list .2; edit list .1

Date	Staff	Amount of Time	Description
7/31/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#260 - NOTICE of Withdrawal of Consent to Sue of James B. McCartt ; filed by Plaintiff Patty Thomas. (Dunn, Matt)
7/31/2014	AG	0.1	ECF Filing of NOTICE of Withdrawal of Consent to Sue of James B. McCartt
7/31/2014	AG	0.2	prepare Notice of withdraw of Consents to Sue for filing
7/31/2014	MD	0.2	dg/md edit keyword search list .2
7/31/2014	MD	0.1	md reviewing and editing opt-out form 0.1
7/31/2014	KW	0.3	telephone call to PLT [ ] to schedule deposition noticed by defendant .1 add information to case notes .1 add information to deposition tracking spreadsheet .1
7/31/2014	DG	0.1	review draft motions to amend scheduling order and appt magistrate .1
7/31/2014	KW	0.3	telephone call to PLT [ ] schedule deposition noticed by defendant .1 add information to case notes .1 add information to deposition tracking spreadsheet .1
7/31/2014	MD	0.2	md speaking with client about decision to opt-out of case 0.2
7/31/2014	KW	0.3	telephone call to PLT [ ] to schedule deposition noticed by defendant .1 add information to case notes .1 add information to deposition tracking spreadsheet .1
7/31/2014	MD	0.8	md/kw review deponent list presented by defendant to determine and propose deposition schedule discuss and plan staffing and travel discuss and plan deposition preparation discuss and plan document review needed review defendant's document production to see what has been produced and what is missing
7/31/2014	KW	0.6	fact finding discussion with plaintiff concerning emails he is forwarding concerning budget and variable labor hours .3 review emails from plaintiff .2 add information to case notes .1
7/31/2014	KW	0.5	Review documents produced by defendant for deponent [ ]- .3 print and make files for attorney for deposition preparation .2
7/31/2014	MD	0.1	md email defense counsel about extension of time to respond to motions to compel 0.1
7/31/2014	KW	0.8	md/kw review deponent list presented by defendant to determine and propose deposition schedule discuss and plan staffing and travel discuss and plan deposition preparation discuss and plan document review needed review defendant's document production to see what has been produced and what is missing
8/1/2014	AG	0.1	ECF Filing of MOTION for Relief from a Deadline to Respond to Defendants Motion to Compel (Docs 256-258) (Attachments: # (1) Exhibit 1 Email, # (2) Exhibit 2 Picture, # (3) Exhibit 3 Representative Discovery letter, # (4) Exhibit 4 letter, # (5) Proposed Order)
8/1/2014	CM	0.1	Noting Date 8/15/2014,
8/1/2014	CM	0.1	call from client with questions re status of case (.1)
8/1/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#261 - MOTION for Relief from a Deadline to Respond to Defendants Motion to Compel (Docs 256-258) by Plaintiff Patty Thomas. (Attachments: # (1) Exhibit 1 Email, # (2) Exhibit 2 Picture, # (3) Exhibit 3 Representative Discovery letter, # (4) Exhibit 4 letter, # (5) Proposed Order) Noting Date 8/15/2014, (Dunn, Matt)
8/4/2014	KW	0.4	fact finding interview with current employee .3 add information to case notes .1
8/4/2014	KW	0.2	review deposition tracking spreadsheet to determine status of plaintiff responses and to determine contacts to be made .1 update spreadsheet .1



Date	Staff	Amount of Time	Description
8/4/2014	KW	0.3	resent discovery response documents to Greenburg Trauig .2 email information to M. Dunn .1
8/4/2014	KW	0.4	fact finding discussion with [ ] regarding most effective way to communicate primary job duty information to a jury .2 add informatin to case notes .1 email information to litigation team .1
8/4/2014	CLER	0.1	PCF client (Data Entry of updated contact information of client)
8/4/2014	KW	0.2	telephone call from R. Roark- attorney in KY- with questions regarding scope of the complaint we filed email questions to litigation team
8/4/2014	KW	0.4	draft email to current Kellogg employees to explain we need to discuss litigation issues and seeking to scheudle fact finding interview .3 email to list of current employees who responded to [questions] by 7-24-14 .1
8/4/2014	KW	0.2	review of documents needing redaction before production to defendant .2 discussion of deposition schedule and format .2
8/4/2014	JS	0.2	call, ref to KW
8/4/2014	KW	0.4	telephone call to schedule deposition .1 email follow-up to schedule deposition .1 add informatin to case notes .1 add information to depostion tracking spreadsheet .1
8/4/2014	KW	0.6	discuss litigation progress and deposition scheduling with deponent .4 add information to deposition tracking spreadsheet .1 email schedule to attorney .1
8/4/2014	AG	0.2	create Fedex label for client to mail documents
8/4/2014	KW	0.4	fact finding interview with current employee plaintiff .3 add information to case notes .1 review excel scorecard files of named plaintiffs to be downloaded .1 email to IT paralegal
8/4/2014	KW	0.2	to seek assistance in successfully downloading electronic files .1
8/4/2014	KW	0.1	email status report to attorney regading deposition schedule conformations
8/4/2014	KW	1.1	fact finding interview regarding current employemtn- job duties, and hours and stress .9 add informati to case notes .1 create speadsheet of plaintiffs and evidence to support claims .1
8/4/2014	JS	0.2	call respo to email
8/4/2014	KW	0.2	respond to plaintiff's questions regarding case progress .2
8/5/2014	KW	0.4	prepare files of documents produced by defendant for deponents to review prior to depositions in August and September .4
8/5/2014	MA	0.1	call from client [ ]
8/5/2014	MA	0.1	call from client [ ]
8/5/2014	KW	0.4	fact finding interview with plaintiff called for deposition by defendant .4
8/5/2014	KW	0.1	respond to email to schedule fact finding interview .1
8/5/2014	KW	0.7	initial fact finding interview with plaintiff [ ] .7
8/5/2014	AG	0.1	create Fedex label for client to mail documents
8/5/2014	KW	0.5	fact finding interview with [ ] concerning changes in working conditions at Kellogg .4 add information to case notes .1
8/5/2014	KW	0.4	draft memo re information gleaned in fact finding interview .2 email to case attorney .1 add to case notes .1
8/5/2014	JS	0.3	call re FMLA and severnace--JLP knows what this is about
8/5/2014	KW	0.6	fact finding intake interview .6
8/5/2014	KW	0.4	mr/kw work to modify Java security settings and down load defendant's document productions .4
8/5/2014	MR	0.4	mr/kw work to modify Java security settings and down load defendant's document productions .4

Date	Staff	Amount of Time	Description
8/5/2014	KW	0.3	draft cover email .1 email FEDEX shipping label to plaintiff called for a deposition by defendant .1 add information to case notes .1
8/5/2014	KW	0.4	mr/kw review web search of videographers in [ ] area to determine best possibility to engage for video taping and presentation to jury of a day in life video of RSR-DSD at work respond to plaintiff's questions about case progress and litigation going forward .2
8/5/2014	KW	0.3	update case notes .1
8/5/2014	KW	0.3	draft cover email .1 email FEDEX shipping label to plaintiff called for a deposition by defendant .1 add information to case notes .1
8/5/2014	MR	0.4	review new email production and need for dtsearch indexing
8/5/2014	KW	0.6	telephone call to discuss deposition notice, deposition information and document production .3 email to attorney re deposition schedule .1 add information to case notes .1 update deposition tracking spreadsheet .1
8/5/2014	MR	0.4	mr/kw review web search of videographers in [ ] area to determine best possibility to engage for video taping and presentation to jury of a day in life video of RSR-DSD at work
8/5/2014	KW	0.6	fact finding interview with current Kellogg employee who is a plaintiff .6
8/5/2014	KW	0.5	download personnel files produced by defendant .4 organize electronic file of documents .1 organize electronic file
8/6/2014	KW	1.5	jp/kw review plaintiffs' deposition schedule- plan cities and states for each deposition- checking mapquest and directions for each- review document production schedule- determine work still needed to comply with defendant's document demands discuss and plan agenda for litigation team meeting
8/6/2014	JP	0.1	jp/kw confer to attempt to clarify latest demands from defendant in light of defense counsel's upcoming honeymoon .1
8/6/2014	KW	0.4	initial intake interview .3 add information to case notes .1
8/6/2014	KW	0.4	initial intake interview .3 add information to case notes .1
8/6/2014	KW	0.5	fact finding interview with current employee plaintiff regarding changes in district organization and compensation plan .5
8/6/2014	KW	0.1	email in response to plaintiff [ ]'s questions
8/6/2014	KW	0.6	review responses to email from current employees who are opt-ins .3 review case notes to determine whom to contact for additional information .3
8/6/2014	KW	0.1	draft email to plaintiff to respond to her questions .1
8/6/2014	KW	0.1	email to attorney-to request telephone conference to clarify demands from defendant .1
8/6/2014	JP	0.3	call to confirm depo dates and ability to travel to Lexington.
8/6/2014	KW	0.6	fact finding interview about Kellogg's Cross Dock Program and auto shipping by managers .6
8/6/2014	KW	0.2	email response to plaintiff [ ] re her responses to [questions] .1 add information to case notes .1
8/6/2014	KW	0.1	jp/kw confer to attempt to clarify latest demands from defendant in light of defense counsel's upcoming honeymoon .1
8/6/2014	KW	0.8	fact finding interview about how corporate sales are made .6 add information to case notes .1 add information to Proof Chart .1
8/6/2014	JP	0.3	called to confirm depo date and describe process of a deposition
8/6/2014	KW	0.4	interview video production company .3 draft memo to litigation team with details of company's estimates for video demonstrating primary job duty- .1
8/6/2014	JP	0.2	potential plaintiff called to share more information about the defendant
8/6/2014	KW	0.4	exploratory discussion with video company regarding possibility of video record of employees work day- prepare memo to litigation team .1

Date	Staff	Amount of Time	Description
8/6/2014	JP	1.5	jp/kw review plaintiffs' deposition schedule- plan cities and states for each deposition- checking mapquest and directions for each- review document production schedule- determine work still needed to comply with defendant's document demands discuss and plan agenda for litigation team meeting
8/6/2014	AG	0.2	prepare document for filing (Motion to Withdrawl Motion)
8/7/2014	JP	1.5	jp/kw- finalize deposition shedule-including date, time, city and state for 7 depositions of plaintiffs review defendant document production of plaintiff's region scorecards to anayze data draft memo of issues and questions for attorneys
8/7/2014	JP	0.5	client requested to be withdrawn from case, discussed reasons.
8/7/2014	KW	0.4	telephone call to schedule interview regarding deposition .1 email to plaintiff to schedule interview regarding deposition .1 add information to case notes .1 add information to spreadsheet tracking deposition scheduling .1
8/7/2014	KW	0.5	download latest production from defendant .2 review production to determine if production is responsive to document requests .3
8/7/2014	AG	0.2	prepare Notice of withdrawal of Consents to Sue
8/7/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#263 - NOTICE of Withdrawal of Consent to Sue ; filed by Plaintiff Patty Thomas. (Dunn, Matt)
8/7/2014	AG	0.1	ECF Filing of NOTICE of Withdrawal of Consent to Sue
8/7/2014	KW	0.6	review plaintiff documents to produce to defendant to respond to document demands .2 redact documents as needed .1 use software to combine and bates stamp documents .2 produce to defendant .6
8/7/2014	KW	0.3	organize information from fact finding interview .1 add information to case notes .1 update case proof chart .1
8/7/2014	KW	0.6	initial intake interview .5 add information to case contacts .1
8/7/2014	JP	0.2	email request for him to call re deposition .1; talked and arranged time for further discussion .1
8/7/2014	JP	0.1	email update on case as requested
8/7/2014	KW	0.4	drat email to defendant counsel detailing information regarding date, city and state for 7 schedule depositions .4
8/7/2014	KW	1.5	jp/kw- finalize deposition shedule-including date, time, city and state for 7 depositions of plaintiffs review defendant document production of plaintiff's region scorecards to anayze data draft memo of issues and questions for attorneys
8/8/2014	JP	0.3	called to discuss in more detail the pros and cons of opting out.
8/8/2014	JP	0.6	fact finding intake
8/8/2014	JP	0.6	fact finding intake with concentration on hours worked
8/8/2014	JP	0.4	discussed filing a late consent to sue and why he didn't file on time and explained case
8/8/2014	JP	0.9	called to discuss possibility of being deposed, did fact finding intake about work with Kellogg, explained the process of depositions and the date requested
8/8/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of Adam Hughes)
8/8/2014	JP	0.6	fact finding intake with emphasis on current work conditions
8/8/2014	JP	0.5	discussed current method of getting product into the stores & the use of scorecards
8/8/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/8/2014	JP	0.2	responded to email re her [questions] results

Date	Staff	Amount of Time	Description
8/8/2014	JP	0.6	discussion of current ways of product being sold in to stores by DM, ZM, AM and cross doc
8/8/2014	JS	0.1	call for kw or jp
8/11/2014	KW	0.4	mr/kw discuss content of defendant's document production; discuss usefulness to supporting claims; discuss responsiveness to document requests ; discuss what possibly exists and what is still needed
8/11/2014	KW	0.1	telephone call to discuss schedule to demonstrate primary job duty- in preparation for litigation .1
8/11/2014	JP	0.5	jp/kw identify and discuss work needed to complete deposition schedule as noticed and agreed to be defendant .3 discussion of various methods to secure committment to deposition from opt-in plaintiffs [ ] and [ ] .2
8/11/2014	KW	0.2	telephone to respond to plaintiffs questions .1 add information to case notes .1
8/11/2014	CLER	0.1	Data Entry of contact information of new client
8/11/2014	CLER	0.2	prepare welcome ltr to new client
8/11/2014	KW	0.7	Organize document pdfs of documents sent by plaintiff [ ] to prepare for Bates Stamping .2 Bates Stamp documents .1 Use Send6 to forward Bates stamped documents to defendant in response to document requests .4
8/11/2014	MR	0.4	mr/kw discuss content of defendant's document production; discuss usefulness to supporting claims; discuss responsiveness to document requests ; discuss what possibly exists and what is still needed
8/11/2014	KW	0.4	fact finding interview wiht current employee regarding current work conditions- hours and job duties .3 add information to case notes .1
8/11/2014	AG	0.1	ECF Filing of NOTICE to Withdraw Pending Motion re [261] MOTION for Relief from a Deadline to Respond to Defendants Motion to Compel (Docs 256-258)
8/11/2014	KW	0.2	telephone call to discuss best deposition date .1 add information to case notes .1
8/11/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#265 - NOTICE to Withdraw Pending Motion re [261] MOTION for Relief from a Deadline to Respond to Defendants Motion to Compel (Docs 256-258) ; by Plaintiff Patty Thomas. (Dunn, Matt)
8/11/2014	KW	0.4	dg/jp/kw discussion of the details of information we need to present and illustrate in video of current employee to support claims in this case.3 discussion of work schedule and process going forward to video [ ] at work .1
8/11/2014	KW	0.2	telephone call and email to follow-up on plaintiff's responses to [questions] about current work situation . add information to case notes
8/11/2014	KW	0.3	update depostion information for plaintiff depositions .1 calendar depositions which have been confirmed by defendant .2
8/11/2014	KW	0.2	drafted email to named plaintiff regarding his need to communicate with us regarding a new deposition date and document production .2
8/11/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#264 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Adam Hughes)(Dunn, Matt)
8/11/2014	KW	0.5	jp/kw identify and discuss work needed to complete deposition schedule as noticed and agreed to be defendant .3 discussion of various methods to secure committment to deposition from opt-in plaintiffs [ ] and [ ] .2
8/11/2014	DG	0.4	dg/jp/kw discussion of the details of information we need to present and illustrate in video of current employee to support claims in this case.3 discussion of work schedule and process going forward to video [ ] at work .1

Date	Staff	Amount of Time	Description
8/11/2014	JP	0.4	dg/jp/kw discussion of the details of information we need to present and illustrate in video of current employee to support claims in this case.3 discussion of work schedule and process going forward to video [ ] at work .1
8/12/2014	CLER	0.2	create PDF format of documents recd from D. ( D. 1st request for admissions, 1st request for documents and 1st set of rogs to [client])
8/12/2014	JP	2.5	jp/kw-- reveiw deposition transcripts of 30(b)(6) depostions; review documents produced by defendant; review documents produced by plainitffs, review defendant's answer to complaint-- to determine and prepare documents for exhibits to support plaintiff's response to motion to compel
8/12/2014	KW	0.4	initial intake interview .3 add information to case notes .1
8/12/2014	MA	1.5	creating TOC and TOA for response to k motion to compel discovery
8/12/2014	CLER	1	Enter client data into spreadsheet
8/12/2014	KW	0.2	research dates of defendant discovery production and add information to spreadsheet .2
8/12/2014	JP	0.2	jp/kw discussion to clarify and determine errors in deposition notices received from defendant .2
8/12/2014	KW	0.3	respond to named plaintiff's questions regarding case progress and developments .2 update address and contact information in case files .1
8/12/2014	KW	0.2	repsond to plaintiff's email regarding changes in her work situation at Kellogg .1 add information to case notes .1
8/12/2014	MA	0.1	DG/MA review table of authorities
8/12/2014	MA	0.1	DG/MA review revisions to table of authorities for response brief to motion to compel
8/12/2014	DG	0.1	DG/MA review table of authorities
8/12/2014	KW	0.3	download latest document production from defendant .2 email information regarding latest discovery to litigation team .1
8/12/2014	DG	0.1	DG/MA review revisions to table of authorities for response brief to motion to compel
8/12/2014	KW	2.5	jp/kw-- reveiw deposition transcripts of 30(b)(6) depostions; review documents produced by defendant; review documents produced by plainitffs, review defendant's answer to complaint-- to determine and prepare documents for exhibits to support plaintiff's response to motion to compel
8/12/2014	KW	0.2	jp/kw discussion to clarify and determine errors in deposition notices received from defendant .2
8/12/2014	DG	6.2	draft response to def motion to compel 4.2; review def brf re request to admit .8; draft response to motion to treat requests to admit as admitted 1.2
8/13/2014	DG	0.6	final edits to response to motion to compel .4; final edits to response to motion to deem admitted .2
8/13/2014	AG	0.1	ECF Filing of RESPONSE to [256] MOTION to Compel and Deem Requests Admitted.
8/13/2014	DG	0.2	DG/KW/JP discuss exhibits needed for motion in response to K MTC
8/13/2014	KW	0.2	DG/KW/JP discuss exhibits needed for motion in response to K MTC
8/13/2014	JP	0.2	DG/KW/JP discuss exhibits needed for motion in response to K MTC
8/13/2014	AG	0.2	ECF Filing of RESPONSE, by Plaintiff Patty Thomas, to [258] MOTION to Compel Each Opt-In Plaintiffs' Responses to First Set of Request for Production of Documents. (Attachments: # (1) Exhibit 1 Requests for Walz, # (2) Exhibit 2 Def. Answer to Complaint, # (3) Exhibit 3 Model Summary, # (4) Exhibit 4 Sayedi Paystub, # (5) Exhibit 5 TM Expectations, # (6) Exhibit 6 Activity Log Instructions)(

Date	Staff	Amount of Time	Description
8/13/2014	JP	0.9	jp/kw- review sections of plaintiff's brief in response to motion to compel prior to filing .5 prepare exhibits to support fact sections regarding job duties and hours worked .4
8/13/2014	CLER	2.5	review document production of defendant to select material for exhibits to file in support of response to Def. motion to compel discovery review document production of plaintiffs to select material for exhibits to file in support of response to Def. motion to compel discovery select support documents to use as exhibits create pdfs of sections needed update electronic file of possible exhibits for attorney's selection draft letter to state class representative [ ] to establish contact to reschedule depositions .2
8/13/2014	KW	0.3	process mailing .1
8/13/2014	KW	0.9	jp/kw- review sections of plaintiff's brief in response to motion to compel prior to filing .5 prepare exhibits to support fact sections regarding job duties and hours worked .4
8/14/2014	MR	0.1	JP/MR phone call discuss messaging system used by RSRs/TMs
8/14/2014	MR	2.6	continued work on ESI protocol: add section for fileserver documents; add section for production from database; continued work on documents to request
8/14/2014	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(Docket#266 - RESPONSE, by Plaintiff Patty Thomas, to [258] MOTION to Compel Each Opt-In Plaintiffs' Responses to First Set of Request for Production of Documents. (Attachments: # (1) Exhibit 1 Requests for Walz, # (2) Exhibit 2 Def. Answer to Complaint, # (3) Exhibit 3 Model Summary, # (4) Exhibit 4 Sayedi Paystub, # (5) Exhibit 5 TM Expectations, # (6) Exhibit 6 Activity Log Instructions)(Getman, Dan)
8/14/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#267 - RESPONSE, by Plaintiff Patty Thomas, to [256] MOTION to Compel and Deem Requests Admitted. (Getman, Dan)
8/14/2014	AG	0.1	dg/ag discuss highlighting "I don't know" from IT depo transcript for def counsel, request to renew depo .1
8/14/2014	MR	0.1	send follow-up email to para JP regarding ESI search term list
8/14/2014	MR	0.2	send follow-up email to atty DG regarding ESI protocol .1, transfer my edited draft ESI protocol to server .1
8/14/2014	MR	3.5	additional research of Def production and 30b6 depo for ESI production requests
8/14/2014	MR	0.1	transfer my updated draft ESI protocol to server .1
8/14/2014	DG	0.4	review transcript re renewing IT depo .1; dg/ag discuss highlighting "I don't know" from IT depo transcript for def counsel, request to renew depo .1; draft email to def counsel re same .2
8/14/2014	JP	0.1	JP/MR phone call discuss messaging system used by RSRs/TMs
8/14/2014	MR	0.1	email 2nd edit of DG ltr to Def C regarding 30b6 deficiencies
8/14/2014	MR	0.4	read atty DG draft email about 30b6 deficiencies .1, send email reply of edits to DG draft email .3
8/14/2014	JP	0.1	JP/MR discuss ESI protocol and other case work
8/14/2014	MR	0.1	JP/MR discuss ESI protocol and other case work
8/14/2014	AG	0.4	reviewing deposition transcript for key word
8/14/2014	MR	0.1	DG/MR phone call - brief exchange related to ESI protocol
8/14/2014	MR	0.1	leave msg for para JP about ESI search term list
8/14/2014	CLER	0.1	prepare fedex mailing label for client mailing of docs
8/14/2014	DG	0.1	DG/MR phone call - brief exchange related to ESI protocol



Date	Staff	Amount of Time	Description
8/18/2014	MR	0.2	JS/MR phone call re: depo prep video
8/18/2014	MR	1.1	review previous documents to note other items to include on RFP or ask if we received
8/18/2014	MR	0.1	prep for meeting
8/18/2014	MD	1	md compiling list of deponents 1.0
8/18/2014	DG	1.8	md/dg/mr/jp case discovery and strategy meeting 1.8
8/18/2014	MD	0.1	MD/MR discuss video on preparing a depo witness
8/18/2014	MR	1.8	md/dg/mr/jp case discovery and strategy meeting 1.8
8/18/2014	MD	1.8	md/dg/mr/jp case discovery and strategy meeting 1.8
8/18/2014	JP	1.8	md/dg/mr/jp case discovery and strategy meeting 1.8
8/18/2014	MD	0.2	md call with client about deposition 0.2
8/18/2014	MR	4.2	work on merging and reconciling columns and discrepancies in 2010 variable labor reports
8/18/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#268 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Mark Caldwell)(Dunn, Matt)
8/18/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue(Attachments: # (1) Consent to Sue of Mark Caldwell)
8/18/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/18/2014	CLER	0.2	prepare welcome ltr to new client
8/18/2014	CLER	0.1	Data Entry of contact information of new client
8/18/2014	JP	2.9	JP/MR work on keyword search and other discovery concerns
8/18/2014	MR	2.9	JP/MR work on keyword search and other discovery concerns
8/18/2014	JS	0.2	JS/MR phone call re: depo prep video
8/18/2014	MR	0.7	research re: online depo preparation materials for upcoming depositions
8/18/2014	MR	0.1	DG/MR discuss video on preparing a depo witness
8/18/2014	DG	0.1	DG/MR discuss video on preparing a depo witness
8/18/2014	MR	0.1	MD/MR discuss video on preparing a depo witness
8/19/2014	JP	0.1	JP/DG/MD dicuss info discussed by plaintiff that we need to request in discovery
8/19/2014	DG	0.1	JP/DG/MD dicuss info discussed by plaintiff that we need to request in discovery
8/19/2014	MD	0.1	JP/DG/MD dicuss info discussed by plaintiff that we need to request in discovery
8/19/2014	CLER	0.3	prepare fedex shipping label from client mailing of documents
8/19/2014	JP	0.5	call to explain and arrange depo prep time and email confirmation
8/19/2014	JP	0.4	called to let us know he gave notice at Kellogg and issues leading to this
8/19/2014	MD	0.5	md call with counsel in Kehe case discussing outside sales exemption 0.5
8/19/2014	JP	0.6	called to discuss issue of returning to kellogg after heart attack and request for light duty.
8/19/2014	DG	0.9	review payroll issues .1; draft 30b6 depo notice .8
8/19/2014	JP	0.3	discuss contact info re potential witnesses
8/19/2014	JP	1.2	discuss issue of monthly video conferences from kellogg headquarters, about types of forced ordering of product, about a time study she participated in
8/19/2014	MD	0.3	MD/JP met to discuss deposition schedule, documents, etc.
8/19/2014	MD	2	md drafting 30b6 deposition notice 2.0
8/19/2014	JP	0.3	MD/JP met to discuss deposition schedule, documents, etc.
8/19/2014	MD	1.5	md reviewing outstanding discovery 1.5
8/19/2014	MD	0.2	md call with client about deposition 0.2
8/19/2014	JP	0.5	call to explain and arrange depo prep time and email confirmation

Date	Staff	Amount of Time	Description
8/20/2014	MD	0.1	md call defense counsel about discovery 0.1
8/20/2014	MD	0.7	md prepare for call with defense counsel about outstanding discovery 0.7
8/20/2014	MR	4.8	install dtsearch on lab computer .3, create search folder for emails of interest .1, perform searches of emails on a multitude of keywords 4.5
8/20/2014	MD	1.5	md draft 30b6 deposition notice 1.5
8/21/2014	MD	1.5	md reviewing discovery production 1.5
8/21/2014	MR	0.4	edit draft ESI protocol .2, detailed email to attys/paras re: draft ESI protocol and search term list .2
8/21/2014	MD	0.4	md call with client about sitting for deposition 0.4
8/21/2014	MD	0.7	md speak with client about deposition 0.7
8/21/2014	MD	2.5	md preparing deposition defense outline 2.5
8/21/2014	MR	1.5	work on allowing access to psts on fileserver
8/21/2014	MD	0.3	md/mr discussing ESI protocol and review of emails 0.3
8/21/2014	MR	0.3	attempt to download production from Def per Def's email on Monday .2, email to atty MD about inability to perform download .1
8/22/2014	MD	0	md review documents
8/22/2014	MD	2	md preparing client for deposition 2.0
8/22/2014	MD	4	md prepare client for deposition 4.0
8/22/2014	MD	0.3	md speaking with clients about deposition schedule 0.3
8/22/2014	MR	4.6	work on email production search result summaries 3.6; review and suggest additions to keyword search list 1.0
8/25/2014	KW	1.5	jp/kw review spreadsheets detailing deposition scheduling, deposition preparation schedule, documents received, plaintiff documents produced and work still needing completion 1.5
8/25/2014	MR	0.7	md/mr/jp/kw litigation team meeting to finalize tasks to be accomplished for depositions of plaintiffs finalize ESI requests
8/25/2014	JP	0.7	md/mr/jp/kw litigation team meeting to finalize tasks to be accomplished for depositions of plaintiffs finalize ESI requests
8/25/2014	MD	0.3	md/mr discussing ESI protocol and Kellogg's recent discovery production 0.3
8/25/2014	KW	0.7	fact finding interview with plaintiff regarding disability and his problems dealing with Kellogg regarding disability and payments .7
8/25/2014	JP	1.5	jp/kw review spreadsheets detailing deposition scheduling, deposition preparation schedule, documents received, plaintiff documents produced and work still needing completion 1.5
8/25/2014	KW	1.5	preparation of materials for attorney to review with plaintiff deponents to prepare for deposition 1.5
8/25/2014	KW	1.4	download files produced by defendant in response to discovery requests update electronic files of documents produced review latest document production for content and responsiveness
8/25/2014	JS	0.2	call for MD, re: severance issues
8/25/2014	KW	0.3	telephone call to discuss and finalize location for deposition .2 add information to case notes .1
8/25/2014	KW	0.1	update electronic file of def. document requests, RFAs and interrogatories
8/25/2014	MR	0.3	md/mr discussing ESI protocol and Kellogg's recent discovery production 0.3
8/25/2014	KW	0.7	md/mr/jp/kw litigation team meeting to finalize tasks to be accomplished for depositions of plaintiffs finalize ESI requests
8/25/2014	MD	0.7	md/mr/jp/kw litigation team meeting to finalize tasks to be accomplished for depositions of plaintiffs finalize ESI requests
8/26/2014	JP	0.4	jp/kw format and formulate draft repsonses to defendant RFAs for Named Plaintiff [ ] .4

Date	Staff	Amount of Time	Description
8/26/2014	KW	0.4	prepare responses to defendant's RFAs .2 telephone call to named plaintiff to schedule appointment to discuss responses to RFAs .1 email explanation and draft responses to named plaintiff for review .1
8/26/2014	KW	0.4	jp/kw format and formulate draft responses to defendant RFAs for Named Plaintiff Patty Thomas .4
8/26/2014	MD	14	md travel to Minnesota for deposition (reviewing plaintiffs documents on plane for part of flight 2.0) 14.0
8/26/2014	MA	0.1	call from client [ ]
8/26/2014	KW	0.4	prepare responses to defendant's RFAs .2 telephone call to named plaintiff to schedule appointment to discuss responses to RFAs .1 email explanation and draft responses to named plaintiff for review .1
8/26/2014	KW	0.4	prepare responses to defendant's RFAs .2 telephone call to named plaintiff to schedule appointment to discuss responses to RFAs .1 email explanation and draft responses to named plaintiff for review .1
8/26/2014	MR	1.5	review new production from Def related to ESI and tech aspects
8/26/2014	KW	0.5	prepare draft RFA responses for named plaintiffs: [ ] and [ ]
8/26/2014	KW	0.1	respond to emailed questions from plaintiffs' attorney defending depositions in Missouri .1
8/26/2014	KW	0.8	jp/kw review defendants latest requests to Admit for named plaintiffs : [ ], [ ], [ ] and [ ] to draft responses .8
8/26/2014	KW	0.2	telephone call from named plaintiff regarding responses to RFAs .1 add information to case notes .1
8/26/2014	JP	0.8	jp/kw review defendants latest requests to Admit for named plaintiffs : [ ], [ ], [ ] and [ ] to draft responses .8
8/27/2014	KW	0.5	fact finding call from plaintiff [ ] regarding change in holiday policy by her manager at Kellogg .4 add informatio to case notes .1
8/27/2014	KW	0.8	prepare documents submitted by plaintiff [ ] for production to defendant: redactions, organization, Bates Stamping .7 transmit to Def. counsel vial Send 6 .1
8/27/2014	KW	1.1	prepare plaintiff documents for production to defendant: review, redact, Bates Stamp
8/27/2014	KW	0.4	telephone conference with attorney regarding reveiw of documents from plaintiffs to produce to defendant- discuss and identify documetns needing clarification and redaction
8/27/2014	KW	0.5	prepare final document transfer to defense counsel of documents submitted by plaintiff [ ]- organization and Bates Stamping .3 use Send6 to transfer files to defense counsel .2
8/27/2014	KW	0.2	telephone call to plaintiff to schedule interview to complete RFAs to respond to def. .1 add information to case notes .1
8/27/2014	MD	0.4	telephone conference with attorney regarding reveiw of documents from plaintiffs to produce to defendant- discuss and identify documetns needing clarification and redaction
8/27/2014	MD	9.5	md defend deposition; prepare client for deposition, and discuss deposition with client after deposition 9.5
8/27/2014	KW	0.8	prepare plaintiff documents for production to defendant: review, redact, Bates Stamp .7 transmit to defense counsel via Send6 .1
8/27/2014	KW	0.8	fact finding interview to complete name plaintiff's responses to RFAs for defendant .6 prepare responses for attorney review .1 email expanations and responses to attorney for reveiw and apporval .1

Date	Staff	Amount of Time	Description
			fact finding interview to complete responses to defendant's RFAs .7 update information
8/27/2014	KW	0.9	.1 email responses to attorney for review .1
8/27/2014	MD	1	md prepare for deposition 1.0
8/27/2014	MD	0.2	md communicate with client about deposition 0.2
8/27/2014	MD	1	md review and edit request to admit responses 1.0
			jp/mr/kw review each point of requests for document production to be propounded to Kellogg determine information requested repeatedly and needing to be considered for motion to compel determine issues to possibly be dealt with by RTAs--for defendant to produce the information or acknowledge it does not exist produce cumulative memo for
8/28/2014	JP	2.4	litigation team meeting scheduled for 9/3/14
			jp/mr/kw review each point of requests for document production to be propounded to Kellogg determine information requested repeatedly and needing to be considered for motion to compel determine issues to possibly be dealt with by RTAs--for defendant to produce the information or acknowledge it does not exist produce cumulative memo for
8/28/2014	MR	2.4	litigation team meeting scheduled for 9/3/14
8/28/2014	MR	1.7	initial work on ESI RFP
8/28/2014	KW	0.1	draft and send email to deponent to reschedule deposition venue .1
			research document files produced by defendant to find payroll data for deponent [ ] .2
8/28/2014	KW	0.3	print pdf for file of materials for preparation .1
8/28/2014	KW	0.2	KW/MA file motion to request magistrate through ECF
8/28/2014	MA	0.2	KW/MA file motion to request magistrate through ECF
8/28/2014	MD	0.5	md edit and file motion for time to file class action motions 0.5
			jp/kw review and discuss RFAs and responses needing confirmation and/or substantive responses to clarify discussions with plaintiffs determine documentation needed to
8/28/2014	KW	0.9	confirm responses
			prepare PLT Unopposed Motion requesting the Appointment of a Magistrate Judge to Hear Discovery Disputes and Proposed order for filing .2 ECF file Motion and proposed
8/28/2014	KW	0.5	order .2 email to court attaching word version of motion and proposed order .1
8/28/2014	MD	1	md preparing for deposition 1.0
8/28/2014	MD	0.5	md discussing deposition with client 0.5
			prep materials for meeting about draft RFP .3, distribute minutes of mtg from laptop to
8/28/2014	MR	0.5	paras KW, JP .2
			research document files produced by defendant to find payroll data for deponent [ ] .2
8/28/2014	KW	0.3	print pdf for file of materials for preparation .1
			review attorney edits and comments on draft RFA responses for [ ] .1 prepare final
8/28/2014	KW	0.3	responses in pdf form .1 email with cover email of instructions to Named PLT [ ] .1
			jp/kw review and discuss RFAs and responses needing confirmation and/or substantive responses to clarify discussions with plaintiffs determine documentation needed to
8/28/2014	JP	0.9	confirm responses
			jp/mr/kw review each point of requests for document production to be propounded to Kellogg determine information requested repeatedly and needing to be considered for motion to compel determine issues to possibly be dealt with by RTAs--for defendant to produce the information or acknowledge it does not exist produce cumulative memo for
8/28/2014	KW	2.4	litigation team meeting scheduled for 9/3/14

Date	Staff	Amount of Time	Description
8/28/2014	KW	0.4	prepare pdf of finalized responses to defendant's RFAs. .1 draft cover email of explanations and instructions .2 email pdf to named plaintiff for review and signature .1
8/28/2014	MD	4.5	md defend deposition 4.5
8/28/2014	MD	2	md prepare client for deposition 2.0
8/28/2014	KW	0.3	Research states claimed in state class actions;.1 update information on spreadsheet of state class representatives to have current information about states pled and statutes of limitation for claims in each of the 11 states .1 email hyperlink to M Russo litigation paralegal to inform Requests for Production .1
8/28/2014	KW	0.1	draft and send email to deponent to reschedule deposition venue .1
8/28/2014	MR	0.1	schedule conf with para KW, JP about draft ESI RFP
8/29/2014	MD	7	md travel from Minneapolis to New York from deposition 7.0
8/29/2014	MD	0.1	md email defense counsel about finding coverage for plaintiffs for depositions 0.1
8/29/2014	MA	0.1	call from client [ ]
8/29/2014	MR	2.5	review various Def production
9/1/2014	MD	1	md client deposition prep 1.0
9/2/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#272 - MOTION to Appoint Magistrate Judge to Hear Discovery Disputes by Plaintiff Patty Thomas. (Attachments: # (1) Proposed Order)(Getman, Dan)
9/2/2014	CLER	0.3	scan faxed signd RFA responses of plaintiff [ ] .1 update electronic file of responses .1 email responses of [client] to attorney for review and production to defendant .1
9/2/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#273 - MOTION Clarification of the Minute Order Setting Trial, Pretrial Dates (Doc. 238) re [238] Minute Order Setting Trial and Pretrial Dates,,, by Plaintiff Patty Thomas. (Attachments: # (1) Proposed Order) Noting Date 9/5/2014, (Dunn, Matt)
9/2/2014	KW	0.3	jp/kw- confer regarding still to be completed tasks to respond to defendant's RFAs .1 discuss information in Variable Labor Reports and potential import on litigation .2
9/2/2014	JP	0.3	jp/kw- confer regarding still to be completed tasks to respond to defendant's RFAs .1 discuss information in Variable Labor Reports and potential import on litigation .2
9/2/2014	MD	1	md prepare clients for deposition 1.0
9/2/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#270 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [256] MOTION to Compel and Deem Requests Admitted (Nelson, James)
9/2/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#269 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [258] MOTION to Compel Each Opt-In Plaintiffs' Responses to First Set of Request for Production of Documents (Attachments: # (1) Supplemental Declaration of James M. Nelson)(Nelson, James)
9/2/2014	MR	0.4	mr/kw reveiw and analyze Kellogg Organization charts related to retail sales,.4

Date	Staff	Amount of Time	Description
9/2/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#272-REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [257] MOTION to Compel Each Opt-In Plaintiffs' Responses to First Set of Interrogatories (Nelson, James)
9/2/2014	KW	0.4	mr/kw reveiw and analyze Kellogg Organization charts related to retail sales,.4
9/2/2014	KW	0.4	jp/kw discuss responses to RFAs for named plainitff [ ]- complicated as she worked in Mornign Foods and Snacks division .4
9/2/2014	KW	0.5	download defendant's document production using defendant's document sharing site Organize produciton for review and indexing .5
9/2/2014	KW	0.5	telephone call to discuss production of signed RFAs .2 email follow-up to issues regaridnign RFAs .1 scan completed RFAs .1 email attachments to counsel for review and production to defense counsel .1
9/2/2014	JP	0.3	dg/jp edit [client] response to request to admit .3
9/2/2014	DG	0.3	dg/jp edit [client] response to request to admit .3
9/2/2014	MD	1	md client deposition prep 1.0
9/3/2014	KW	0.8	jp/kw discuss differences in job duties of morning foods and snacks RSRs and TMs to clarify differences discuss RFA responses of named plaintiff [ ] who worked in both job titles-Morning Foods and Snacks
9/3/2014	MD	0.2	md review clients interrogatory responses 0.2
9/3/2014	CLER	2.5	Scan client documents
9/3/2014	MD	0.2	md corresponding with defense counsel about extension of time for [client's] respons to requests to admit 0.2
9/3/2014	CLER	2.6	jp/kw review, analyze and organize documents sent by deponent [ ] in preparation for deposition noticed by defendant
9/3/2014	JP	0.3	dg/jp/kw review, discuss to try and understnd the questions and edit draft RFA responses for named plaintiff [ ]
9/3/2014	DG	0.4	dg/jp/kw review, discuss to try and understnd the questions and edit draft RFA responses for named plaintiff [ ] .3; prepare [client] response to RFA .1
9/3/2014	MD	3	md prepare client for deposition 3.0
9/3/2014	CLER	2.6	jp/kw review, analyze and organize documents sent by deponent [ ] in preparation for deposition noticed by defendant
9/3/2014	CLER	2.2	jp/kw review, analyze and organize documents sent by deponent [ ] in preparation for deposition noticed by defendant
9/3/2014	MD	0.2	md speak with client in preparation for deposition 0.2
9/3/2014	KW	0.9	research documents produced by defendant to prepare for depositions noticed by plaintiff copy to plaintiffs depostion prep file as needed for attorney deponent preparation
9/3/2014	MD	0.1	md send RTA to defense counsel 0.1
9/3/2014	KW	0.3	dg/jp/kw review, discuss to try and understnd the questions and edit draft RFA responses for named plaintiff [ ]
9/3/2014	JP	0.6	dg/md/jp/kw litigation team meeting to discuss results of depositions taken and plan for depositions noticed for next 3 weeks
9/3/2014	MD	0.6	dg/md/jp/kw litigation team meeting to discuss results of depositions taken and plan for depositions noticed for next 3 weeks
9/3/2014	DG	0.6	dg/md/jp/kw litigation team meeting to discuss results of depositions taken and plan for depositions noticed for next 3 weeks
9/3/2014	KW	0.6	dg/md/jp/kw litigation team meeting to discuss results of depositions taken and plan for depositions noticed for next 3 weeks



Date	Staff	Amount of Time	Description
9/3/2014	JP	0.8	jp/kw discuss differences in job duties of morning foods and snacks RSRs and TMs to clarify differences discuss RFA responses of named plaintiff [ ] who worked in both job titles-Morning Foods and Snacks
9/4/2014	MR	2	research, testing and work in preparing laptops cross-platform for depositions
9/4/2014	CLER	0.5	Scan client documents
9/4/2014	DG	0.6	dg/mr/kw/jp/md logistics mtg to make sure we are handling correctly vast discovery process with respect to each plaintiff being deposed with cross ref to late discovery being received from def .6
9/4/2014	KW	0.5	mr/kw review excel spreadsheets from disc sent by [client] to determine content and possible import to litigation
9/4/2014	MR	0.5	examine various documents from client
9/4/2014	MR	0.5	mr/kw review excell spreadsheets from disc sent by [client] to determine content and possible import to litigation
9/4/2014	CLER	0.3	Scan client documents
9/4/2014	KW	0.4	jp/kw review and discuss and finalize responses to RFAs for plaintiff [ ] .4
9/4/2014	CLER	2.2	Scan client documents
9/4/2014	DG	1.8	depo prep [client] 1.8
9/4/2014	CLER	0.9	review and organize documents sent by plaintiff [ ] to comply with defendant's discovery requests
9/4/2014	MR	0.6	dg/mr/kw/jp/md logistics mtg to make sure we are handling correctly vast discovery process with respect to each plaintiff being deposed with cross ref to late discovery being received from def .6
9/4/2014	DG	1.9	md/dg preparing client for deposition 1.9
9/4/2014	KW	0.6	dg/mr/kw/jp/md logistics mtg to make sure we are handling correctly vast discovery process with respect to each plaintiff being deposed with cross ref to late discovery being received from def .6
9/4/2014	JP	0.6	dg/mr/kw/jp/md logistics mtg to make sure we are handling correctly vast discovery process with respect to each plaintiff being deposed with cross ref to late discovery being received from def .6
9/4/2014	MD	0.6	dg/mr/kw/jp/md logistics mtg to make sure we are handling correctly vast discovery process with respect to each plaintiff being deposed with cross ref to late discovery being received from def .6
9/4/2014	MD	1.9	md/dg preparing client for deposition 1.9
9/4/2014	JP	0.4	jp/kw review and discuss and finalize responses to RFAs for plaintiff [ ] .4
9/4/2014	KW	0.5	md/jp/kw- review plaintiffs' document production schedule to determine production done, production needing scanning and production needing attorney review production waiting for Bates stamping and production
9/4/2014	MD	2.5	prepare client for deposition 2.5
9/4/2014	JP	0.5	md/jp/kw- review plaintiffs' document production schedule to determine production done, production needing scanning and production needing attorney review production waiting for Bates stamping and production
9/4/2014	MD	0.5	md/jp/kw- review plaintiffs' document production schedule to determine production done, production needing scanning and production needing attorney review production waiting for Bates stamping and production
9/4/2014	MD	2.2	md prepare client for deposition 2.2
9/5/2014	DG	0.4	dg/jp/md discuss complications with [client] facts for depo prep .4
9/5/2014	CLER	0.1	Data Entry of contact information of new client
9/5/2014	JP	0.4	dg/jp/md discuss complications with [client] facts for depo prep .4
9/5/2014	MD	0.4	dg/jp/md discuss complications with [client] facts for depo prep .4
9/5/2014	DG	0.2	dg/md discuss complicated [client] facts re sales exemption .2

Date	Staff	Amount of Time	Description
9/5/2014	CLER	2.5	Scan client documents
9/5/2014	AN	0.1	send email regarding phone conversation with client
9/5/2014	CM	0.7	JP/AN/CM prepare client documents for production (.7)
9/5/2014	DG	1.3	dg/jp depo prep w [client] 1.3
9/5/2014	DG	0.3	dg/jp/md/mr [part] discuss [client] testimony re primary duty .3
9/5/2014	MD	0.3	dg/jp/md/mr [part] discuss [client] testimony re primary duty .3
9/5/2014	JP	0.3	dg/jp/md/mr [part] discuss [client] testimony re primary duty .3
9/5/2014	MR	0.1	dg/jp/md/mr [part] discuss [client] testimony re primary duty .1
9/5/2014	CM	0.7	JP/AN/CM prepare client documents for production (.7)
9/5/2014	AN	0.7	JP/AN/CM prepare client documents for production (.7) Transfer documents recd from ECF system to docket file and create file copy(Docket#274 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1)
9/5/2014	CLER	0.1	Consent to Sue of Giuseppe Recchia)(Dunn, Matt)
9/5/2014	CM	0.8	AN/CM upload client documents
9/5/2014	AN	0.4	Prepare client files for production md/jp discussing status of discovery production and what is needed for additional prep
9/5/2014	MD	0.4	for depositions 0.4
9/5/2014	MD	0.2	dg/md discuss complicated [client] facts re sales exemption .2
9/5/2014	AN	0.8	AN/CM upload client documents md/jp discussing status of discovery production and what is needed for additional prep
9/5/2014	JP	0.4	for depositions 0.4
9/7/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/8/2014	CLER	0.2	prepare welcome ltr to new client
9/8/2014	JP	0.6	dg/jp discuss depo prep needed .1; prepare [client] for deposition .5
9/8/2014	DG	0.6	dg/jp discuss depo prep needed .1; prepare [client] for deposition .5 email to plaintiff regarding process to release medical records .2 add information to case
9/8/2014	KW	0.3	notes .1 md/kw discussion of need to index defendant's discovery production disucssion of documents provided for each deponent and most effective method to organize and have available for depositions discussion of defendant's request for extension of discovery
9/8/2014	MD	0.4	period determine work plan going forward
9/8/2014	CLER	0.2	organize and update case files .2
9/8/2014	DG	6.2	[client] depo 12 EST - 6:45 (.6 break for dg) md/kw discussion of need to index defendant's discovery production disucssion of documents provided for each deponent and most effective method to organize and have available for depositions discussion of defendant's request for extension of discovery
9/8/2014	KW	0.4	period determine work plan going forward
9/8/2014	KW	0.9	download Kellogg discovery production .2 reveiw production to date to begin to catalogue and determine what has been produced and what has not been produced
9/8/2014	JP	6.8	[client] depo 12 EST - 6:45
9/8/2014	KW	0.6	organize deponents document files .4 update transcript files for plaintiffs [ ] and [ ] .2 draft cover email to explain need for document search and production .1 email FEDEX
9/8/2014	KW	0.3	shipping label to deponent with instructions .1 add information to case notes .1
9/9/2014	MD	0.4	md/dg call with defense counsel about extension of time for discovery 0.4
9/9/2014	AN	3.8	Prepare spreadsheet and review def. documents

Date	Staff	Amount of Time	Description
9/9/2014	DG	0.4	md/dg call with defense counsel about extension of time for discovery 0.4
9/9/2014	KW	0.5	initial intake interview .4 add information to case notes .1
9/9/2014	AG	0.1	prepare Notice of Withdrawal of Consents to Sue
9/9/2014	AN	0.4	Prepare spreadsheet and review def. documents
			md/an/kw review total document production from defendant discuss and plan most effective and efficient way to organize and determine what has been produced and what
9/9/2014	AN	0.4	is missing plan spreadsheet to reflect production content
9/9/2014	MD	0.2	md/dg/kw discussing results of [client] depositions 0.2
			md/an/kw review total document production from defendant discuss and plan most effective and efficient way to organize and determine what has been produced and what
9/9/2014	MD	0.4	is missing plan spreadsheet to reflect production content
			Create PDF format of correspondence recd from DI court reporters (signature pages of
9/9/2014	CLER	0.1	[client] and [client])
9/9/2014	KW	0.2	md/dg/kw discussing results of [client] depositions 0.2
			md/an/kw review total document production from defendant discuss and plan most effective and efficient way to organize and determine what has been produced and what
9/9/2014	KW	0.4	is missing plan spreadsheet to reflect production content
			telephone call from plaintiff regarding possible retaliation claims, severance package and paperwork Kellogg wants her to sign add information to case notes email information to
9/9/2014	KW	0.4	attorney
			download deposition exhibits from HighTail .2 updt electronic file of deposition
9/9/2014	KW	0.3	material for plaintiff [ ]
			an/kw discuss discovery organization tasks and develop spreadsheet to be used by litigation team to quickly know what has been produced by defendant, a description, the
9/9/2014	KW	0.8	years produced and the Bates # .8
9/9/2014	MD	1	md call with client about deposition 1.0
9/9/2014	DG	0.2	md/dg/kw discussing results of [client] depositions 0.2
			jp/kw confer by telephone regarding information related to TMs who worked in CA in
9/9/2014	KW	0.4	preparation for deposition of [client] .4
9/9/2014	AG	0.1	ECF Filing of NOTICE of Withdrawal of Consent to Sue
9/9/2014	CLER	0.3	scan medical reports for deponent [ ] .2 email to attorney for review .1
			Transfer documents recd from ECF system to docket file and create file copy(Docket#275 -
9/9/2014	CLER	0.1	NOTICE of Withdrawal of Consent to Sue ; filed by Plaintiff Patty Thomas. (Dunn, Matt)
			create PDF format of documents recd from D. (D. 1st et of rogs, 1st request of admissions
9/9/2014	CLER	0.2	and 1st request for documents to [client])
9/9/2014	KW	0.3	respond to request for def. counsel to re-send documents via Send6 website .3
			prepare list of all deponents and files for each which need to be assembled for litigation
9/9/2014	KW	0.3	team review .3
9/9/2014	AN	1.2	Prepare spreadsheet and review def. documents
			jp/kw telephone conference to identify any details or information needed from plaintiff
9/10/2014	KW	0.3	deposnents .3
			md/kw determine deposition preparation schedule, documents to be emailed to
9/10/2014	MD	0.1	deponents for review .1
9/10/2014	AN	0.1	Prepare spreadsheet and review def. documents
9/10/2014	CLER	0.2	prepare Fedex shipping label for client mailing of documents
			md/an/kw litigation team meeting to determine tasks needed related to depositions:
9/10/2014	MD	0.5	document review and production, deponent preparation, scheduling .5

Date	Staff	Amount of Time	Description
9/10/2014	AN	0.5	md/an/kw litigation team meeting to determine tasks needed related to depositions: document review and production, deponent preparation, scheduling .5
9/10/2014	KW	0.3	organizing electronic folders of defendant responses to discovery requests .3
9/10/2014	KW	0.1	md/kw determine deposition preparation schedule, documents to be emailed to deponents for review .1
9/10/2014	KW	0.2	draft letter to go with deposition transcript to plaintiff [ ] explaining need for careful review and error process
9/10/2014	KW	0.5	md/an/kw litigation team meeting to determine tasks needed related to depositions: document review and production, deponent preparation, scheduling .5
9/10/2014	KW	0.3	gather documents needed to prepare deponent [ ] for deposition .2 email to deponent with explanatory cover email.1
9/10/2014	JS	0.2	calls (3) and scan and file faxed materials
9/10/2014	KW	0.2	draft letter to go with deposition transcript to plaintiff [ ] explaining need for careful review and error process
9/10/2014	AN	0.4	AR/CM Rename Documents
9/10/2014	DG	6.7	[client] deposition defense (including discussions w client on breaks) 6.7
9/10/2014	KW	0.3	discussion of process to get medical records sent to our office explanation to plaintiff [ ] of need to review deposition transcript and contact us if there are errors
9/10/2014	KW	0.1	an/kw confer regarding defendant's document production- missing all pay stubs and payroll information for deponent [ ]
9/10/2014	KW	0.3	AN/KW review spreadsheet organizing defendant document production; review and analyze apparent problems and discrepancies .3
9/10/2014	KW	0.1	telephone call from deponent regarding results of his diligent search for documents .1
9/10/2014	AN	0.1	an/kw confer regarding defendant's document production- missing all pay stubs and payroll information for deponent [ ]
9/10/2014	AN	0.3	AN/KW review spreadsheet organizing defendant document production; review and analyze apparent problems and discrepancies .3
9/10/2014	KW	0.3	Bates stamp plaintiff [ ] medical records .2 email medical reports for plaintiff [ ] to defense counsel .1
9/10/2014	CM	0.4	AR/CM Rename Documents
9/10/2014	DG	0.8	prepare [client] for deposition .8
9/10/2014	KW	0.1	add information regarding document search to case notes and deposition tracking spreadsheet .1
9/10/2014	KW	0.3	gather documents needed to prepare deponent [ ] for deposition .2 email to deponent with explanatory cover email .1
9/10/2014	KW	1.6	review defendant's discovery production- complete spreadsheet of discovery production- date of production; Bates # and means of production for efficient management and access to discovery by litigation team
9/10/2014	KW	0.4	use Web-based Send6 to send plaintiff Bates stamped documents for plaintiffs [ ] and [ ] to defense counsel
9/10/2014	JP	0.8	prepare [client] for deposition .8
9/10/2014	KW	0.1	Consult on renaming documents
9/10/2014	KW	0.3	gather documents needed to prepare deponent [ ] for deposition .2 email to deponent with explanatory cover email.1
9/10/2014	KW	0.1	telephone call to plaintiff [ ] regarding need for document search .1

Date	Staff	Amount of Time	Description
9/10/2014	KW	0.6	assemble documents needed to be emailed to plaintiff for review in preparation for deposition .4 draft explanatory email and email documents .2
9/10/2014	JP	0.3	jp/kw telephone conference to identify any details or information needed from plaintiff deponents .3
9/10/2014	AN	3.6	Prepare pre-deposition documents
9/10/2014	KW	0.3	discussion with plaintiff regarding his injuries and lack of compensation by employer- Kellogg.3
9/10/2014	KW	0.2	telephone call to deponent [ ] to discuss document production.2
9/11/2014	KW	0.4	dg/an/kw review of information gleaned from deposition of [client] review, discuss and analyze FLSA combination exemption and how it may relate to this litigation
9/11/2014	KW	0.2	telephone call to schedule deposition preparation call add information to case notes
9/11/2014	KW	0.3	telephone call to plaintiff regarding work coverage on deposition day- email to litigation team add information to case notes
9/11/2014	MD	1	md preparing client for deposition 1.0
9/11/2014	KW	0.4	emails and telephone calls to arrange deposition preparation session and to discuss plaintiff document search and production
9/11/2014	KW	0.2	telephone call to discuss plaintiff's concerns about work coverage at Kellogg while he is being deposed by Kellogg email information to litigation team
9/11/2014	MD	2	md prepare client for deposition 2.0
9/11/2014	AN	0.3	dg/md/an/kw discuss how best to prepare witnesses for depositions: discuss wording of FLSA combination exemption; work to articulate most clearly the primary job duty of Territory Managers-RSR-DSDs
9/11/2014	DG	0.3	dg/md/an/kw discuss how best to prepare witnesses for depositions discuss wording of FLSA combination exemption work to articulate most clearly the primary job duty of Territory Managers-RSR-DSDs
9/11/2014	AN	0.3	an/kw modify Indexes discovery production to facilitate more efficient access by litigation team update electronic files
9/11/2014	MD	0.3	dg/md/an/kw discuss how best to prepare witnesses for depositions discuss wording of FLSA combination exemption work to articulate most clearly the primary job duty of Territory Managers-RSR-DSDs
9/11/2014	MD	0.2	md/dg discussing extension of time to complete discovery 0.2
9/11/2014	KW	0.1	update deponent document review file in preparation for deposition .1
9/11/2014	MD	1	md prepare client for deposition 1.0
9/11/2014	MD	0.1	md/kw determine work needed to be completed asap in preparation for depositions noticed by defendant .1
9/11/2014	KW	0.4	review, copy and update electronic files for efficient attorney access during deposition and deposition prep
9/11/2014	DG	0.2	md/dg discuss extension of time to complete discovery 0.2
9/11/2014	AN	0.4	dg/an/kw review of information gleaned from deposition of [client] review, discuss and analyze FLSA combination exemption and how it may relate to this litigation
9/11/2014	KW	0.3	dg/md/an/kw discuss how best to prepare witnesses for depositions discuss wording of FLSA combination exemption work to articulate most clearly the primary job duty of Territory Managers-RSR-DSDs
9/11/2014	KW	0.1	update deponent document review file in preparation for deposition .1
9/11/2014	KW	0.3	an/kw modify Indexes discovery production to facilitate more efficient access by litigation team update electronic files
9/11/2014	AN	1	Prepare material for depositions

Date	Staff	Amount of Time	Description
9/11/2014	KW	0.1	update deponent document review file in preparation for deposition .1
9/11/2014	DG	0.4	dg/an/kw review of information gleaned from deposition of [ ] review, discuss and analyze FLSA combination exemption and how it may relate to this litigation
9/11/2014	MD	6	md defend deposition 6.0
9/11/2014	AN	2.7	Prepare materials for depositions
9/11/2014	KW	0.1	update deponent document review file in preparation for deposition .1
9/11/2014	KW	0.1	update deponent document review file in preparation for deposition .1
9/11/2014	KW	0.1	md/kw determine work needed to be completed asap in preparation for depositions noticed by defendant .1
9/11/2014	AG	0.3	prepare USPS priority mailing to client (documents to review for depositions)
9/11/2014	DG	0.4	research on how to define primary job duty of TMs .4
9/11/2014	AN	2.5	Index deponents' discovery documents
9/12/2014	MD	0.4	md drafting and editing stipulation for extension of time to the discovery deadlines 0.4
9/12/2014	AN	0.7	Review and prepare documents for deposition
9/12/2014	AN	1.5	Review and prepare documents for deposition; Contact deponents regarding time and location of depo-prep and depositions
9/12/2014	MD	0.1	MD/AN Discuss deposition documents
9/12/2014	MA	0.1	call from client [ ]
9/12/2014	DG	0.3	dg/md discuss results of yesterday's deposition of [client] .3
9/12/2014	DG	0.1	edit to discovery extension stipulation proposal .1
9/12/2014	MD	0.3	dg/md discuss results of yesterday's deposition of [client] .3
9/12/2014	AN	1	Review and prepare client documents for deposition preparation
9/12/2014	AN	0.1	MD/AN Discuss deposition documents
9/12/2014	MD	1.1	md call with client about deposition 1.1
9/12/2014	MD	0.5	md reviewing discovery production for preparation for deposition prep with client 0.5
9/15/2014	MR	1	add "docs of interest" sheet to Kellogg Discovery Production master file with listing some past emails 1.0
9/15/2014	KW	0.2	respond to email from plaintiff [client] regarding deposition date and details .1 add information to case notes .1
9/15/2014	KW	0.1	md/kw discuss need to reschedule deposition preparation session
9/15/2014	KW	0.4	read emails outlining administrative exemption .1 read sections of 30(b)(6) deposition testimony of [client] regarding primary job duty of TMs read FLSA 541.708 regarding criteria for combination exemption add notes from plaintiff interviews and documents which address major points
9/15/2014	KW	0.3	save email stating plaintiff has searched and has no documents related to this litigation update electronic folder of documents needing review prior to deposition copy documents received from defendant which are related to this plaintiff and add to plaintiff's review folder
9/15/2014	MR	0.1	research docs - file o[client]organization
9/15/2014	MD	10	deposition 10.
9/15/2014	MR	0.1	JP/MR discuss email production item to be added to Discovery Production sheet
9/15/2014	MR	0.1	email to paras KW and JP about past mtg notes usefulness
9/15/2014	JP	0.1	JP/MR discuss email production item to be added to Discovery Production sheet



Date	Staff	Amount of Time	Description
9/15/2014			Transfer documents recd from ECF system to docket file and create file copy(Docket#276 - MOTION for Extension of Time to Complete Discovery by Defendant Kellogg Company. (Attachments: # (1) Proposed Order) Noting Date 3/5/2015, (Nelson, James)
	CLER	0.1	
9/15/2014	KW	0.1	email information to deponent regarding location of deposition .1
9/15/2014	KW	0.1	email information to plaintiff [client] regarding location of deposition .1
9/15/2014	KW	0.1	respond to email from plaintiff [client] regarding sending medical records needed for discovery
9/15/2014	KW	0.3	work on draft to update website page to provide information to all plaintiffs .3
9/15/2014	KW	0.2	download late document production from defendant .1 add date, Bates # and method of transmission to discovery tracking spreadsheet
9/15/2014	KW	0.1	review litigation team meeting notes from 8-28-14 to determine work to be completed .1
9/15/2014	KW	0.2	telephone call to schedule deposition preparation telephone session .1 email to attorney to arrange deposition preparation session for deponent [client].1
9/16/2014	AN	1.5	Sort and Review Bates Stamped documents from defendant
9/16/2014	AN	1.5	Sort and Review Bates Stamped documents from defendant
9/16/2014	MR	2.4	work on ESI doc request 2.2, locate previous notes relating to doc request issues .2
9/16/2014	KW	0.2	an/kw plan organization, scanning and filing of documents sent by deponent in response to defendant's discovery requests
9/16/2014	KW	0.4	research defendant's document production to find Planograms for stores serviced by deponent [client] in preparation for deposition noticed by defendant
9/16/2014	MR	0.5	assist para KW with identifying planogram for specific deponents for atty MD
9/16/2014	KW	0.1	respond to telephone message from plaintiff [client] regarding appointment for deposition preparation call .1
9/16/2014	AN	0.2	research Defendant's document production to find Planograms for stores serviced by deponent [client] in preparation for deposition noticed by defendant
9/16/2014	AN	0.2	research Defendant's document production to find Planograms for stores serviced by deponent[client] in preparation for deposition noticed by defendant
9/16/2014	MD	10	deposition
9/16/2014	KW	0.1	email changes in deposition preparation call to attorney M. Dunn .1
9/16/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(NOTICE of Docket Text Modification re [276] MOTION for Extension of Time to Complete Discovery : Modified to reflect Joint Motion. (MET)
9/16/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(NOTICE that the following is RE-NOTED: [276] MOTION for Extension of Time to Complete Discovery . Noting Date 9/15/2014. CR 7(d)(1) Same Day Motions. Stipulated motions (see LCR 10(g) shall be noted for consideration for the day they are filed. (MET)
9/16/2014	KW	0.1	email 3rd Amended complaint to attorney for deposition in MI
9/16/2014	AN	0.8	Review Bates Stamped documents from defendant for use in Depositions
9/16/2014	KW	0.4	read deposition transcript of deponent [client] to gain insight into what is being asked of deponents .4
9/16/2014	AN	0.2	an/kw plan organization, scanning and filing of documents sent by deponent in response to defendant's discovery requests
9/16/2014	AN	0.8	Sort and Review Bates Stamped documents from defendant

Date	Staff	Amount of Time	Description
9/16/2014	KW	0.4	research defendant's document production to find Planograms for stores serviced by deponent [client] in preparation for deposition noticed by defendant
9/16/2014	KW	0.2	telephone call to deponent [client] to determine stores he services for Kellogg email information regarding deposition location to deponent [client]
9/16/2014	CLER	1	Sort and scan documents regarding [client]'s medical claims for deposition
9/17/2014	KW	0.3	AN/KW review documents from deponent [client] to be Bates stamped and produced to Kellogg review Bates stamping procedures
9/17/2014	DG	0.2	dg/jp/kw review sections of complaint that will be amended to add 3 named plaintiffs and discuss information needed from new plaintiffs to complete amended complaint .2
9/17/2014	AN	0.1	Call to client to get permission to produce new client documents for deposition and review location of tomorrow's deposition
9/17/2014	KW	0.9	review defendant's document production to determine information provided regarding work hours for TMs and RSR
9/17/2014	KW	0.4	MR/KW review discovery provided by defendant in response to discovery requests to determine what needs to be included in 5th document request
9/17/2014	MD	10	deposition 10
9/17/2014	KW	0.2	Research website to access GT secure file transfer .1 respond to email from GT secure file transfer regarding accessing exhibits for 30(b)(6) deposition .1
9/17/2014	DG	0.4	call to James Boudreau re settlement .3; re calling court re status of extension (joint call) .1
9/17/2014	AN	0.3	AN/KW review documents from deponent M Carns to be Bates stamped and produced to Kellogg review Bates stamping procedures
9/17/2014	AN	0.3	Bates stamp and email client documents for deposition
9/17/2014	KW	0.4	jp/an/kw discuss information needed from documents provided by plaintiffs and most efficient and helpful methods of indexing to provide efficient access by litigation team .4
9/17/2014	AN	0.4	jp/an/kw discuss information needed from documents provided by plaintiffs and most efficient and helpful methods of indexing to provide efficient access by litigation team .4
9/17/2014	JP	0.4	jp/an/kw discuss information needed from documents provided by plaintiffs and most efficient and helpful methods of indexing to provide efficient access by litigation team .4
9/17/2014	AN	0.4	AN/KW work together to acquaint new case paralegal with software to redact, Bates Stamp and use Send6 to produce plaintiff documents to defendant
9/17/2014	KW	0.3	jp/kw review final candidates for additional named plaintiffs for amended complaint .2 discuss details to fax, review and secure signed retainers .1
9/17/2014	AN	2	Review and Index Bates Stamped documents from Def. for deposition
9/17/2014	MR	0.4	MR/KW review discovery provided by defendant in response to discovery requests to determine what needs to be included in 5th document request
9/17/2014	JP	0.3	jp/kw review final candidates for additional named plaintiffs for amended complaint .2 discuss details to fax, review and secure signed retainers .1
9/17/2014	MR	3.6	create new ESI and non-ESI draft doc requests 3.5; email to attys/para for review .1
9/17/2014	KW	0.2	dg/jp/kw review sections of complaint that will be amended to add 3 named plaintiffs and discuss information needed from new plaintiffs to complete amended complaint .2
9/18/2014	AN	0.1	Sent email with document attachments for upcoming deposition
9/18/2014	MR	0.2	review some Def production files related to variable labor

Date	Staff	Amount of Time	Description
9/18/2014	AN	1	Index client documents
9/18/2014	MR	0.4	transfer copies of variable labor and other relevant Def production files from server to lab computer for off-hours work
9/18/2014	AN	0.1	Sent email to Attorney Dunn regarding location of depositions next week
9/18/2014	JP	0.4	JP/KW search discovery files to determine organization and spreadsheet work completed to determine work needed .4
9/18/2014	AN	1	Index Client documents
9/18/2014	KW	0.4	JP/KW search discovery files to determine organization and spreadsheet work completed to determine work needed .4
9/18/2014	MR	0.2	review work that para AR is doing indexing discovery files with regard to providing add'l software to help her work
9/18/2014	MD	10	md deposition 10
9/18/2014	MR	1.2	research ways to expedite indexing the huge number of case production documents
9/18/2014	KW	0.6	use Send6 web program to produce documents to defendant in preparation for deposition .4 email regarding production to PLT attorney and to defense counsel .2
9/18/2014	JP	1.5	JP/AN/KW analyze document tracking and filing system for client- and defendant-produced documents discuss issues to be resolved to organize, annotate and index both sets of documents create a plan of action to complete organization, annotation and indexing tasks review proof chart and plan how to integrate documents into Proof Chart
9/18/2014	AN	1.5	JP/AN/KW analyze document tracking and filing system for client and defendant produced documents discuss issues to be resolved to organize, annotate and index both sets of documents create a plan of action to complete organization, annotation and indexing tasks review proof chart and plan how to integrate documents into Proof Chart
9/18/2014	MR	2.9	work on 2010 variable labor data
9/18/2014	AN	0.1	Sent email with document attachments for upcoming deposition
9/18/2014	AN	2	Index client documents
9/18/2014	AN	0.1	Sent email with deposition Notice attached
9/18/2014	KW	1.5	JP/AN/KW analyze document tracking and filing system for client and defendant produced documents discuss issues to be resolved to organize, annotate and index both sets of documents create a plan of action to complete organization, annotation and indexing tasks review proof chart and plan how to integrate documents into Proof Chart
9/18/2014	AN	0.3	Index Client Documents
9/18/2014	MR	1.3	work on recovering lost production index file from online backup and onsite backup sources and diagnose how file was deleted
9/19/2014	MR	0.3	test script for creating hyperlinks to expedite production indexing
9/19/2014	DG	0.2	dg/jp discuss Boudreau's call to JP re canceling scheduled depos next week .2
9/19/2014	DG	0.1	email to James Boudreau re cancellation of depos .1
9/19/2014	MR	0.1	download Def production file sent via atty MD today from depo
9/19/2014	MR	0.2	assist para AR with software to help with indexing production files
9/19/2014	MR	1.6	work on new tool to help paralegals index all of defendant and plaintiff production
9/19/2014	AN	0.3	AN/MR review new tool for help with indexing production
9/19/2014	MR	0.3	AN/MR review new tool for help with indexing production
9/19/2014	MD	10	Deposition 10
9/19/2014	JP	0.2	dg/jp discuss Boudreau's call to JP re canceling scheduled depos next week .2

Date	Staff	Amount of Time	Description
9/19/2014	AN	0.1	MR/AN Review methods of file indexing for plaintiff's documents
9/19/2014	CLER	0.6	Scan client documents
9/19/2014	AN	2.8	Index client documents
9/19/2014	AN	2	Index client documents
9/19/2014	MR	0.1	add SMS data item to ESI draft doc request
9/19/2014	MR	0.2	JP/MR discuss what is needed for depositions next week
9/19/2014	MR	0.1	MR/AN Review methods of file indexing for plaintiff's documents
9/19/2014	JP	0.2	JP/MR discuss what is needed for depositions next week
9/19/2014	MR	0.1	check laptop availability for JP deposition next week
9/19/2014	AN	0.1	Telephone call regarding upcoming deposition
9/20/2014	JP	3.2	save and review emailed documents
9/22/2014	MR	1.6	examine in depth and write up observations of client's itinerary excel report
9/22/2014			MR/KW review, analyze and work on gleaning claims' relevant information from Itineraries spreadsheet forwarded by plaintiff [client] which appears to indicate hours
	KW	0.6	worked per day- .6
9/22/2014	MR	0.5	amend ESI doc request for two additional items, create exhibits
9/22/2014	KW	0.2	KW/MR discuss expense reimbursements to some TMs/RSRs
9/22/2014	MR	0.6	prep laptop for para JP deposition travel
9/22/2014	KW	0.1	KW/MR discuss Kellogg auto requirements for TMs and RSRs
9/22/2014	MR	0.1	KW/MR discuss Kellogg auto requirements for TMs and RSRs
9/22/2014	MR	0.2	KW/MR discuss expense reimbursements to some TMs/RSRs
9/22/2014			review emails and deposition schedule to determine work needing completion to meet demands of depositions noticed by defendant email questions needing clarification to litigation team
	KW	0.2	
9/22/2014			MR/KW review, analyze and work on gleaning claims' relevant information from Itineraries spreadsheet forwarded by plaintiff [client] which appears to indicate hours
	MR	0.6	worked per day- .6
9/22/2014	MD	10	deposition 10
9/22/2014	MR	1.5	search for itinerary excel documents using dtsearch index of def production (no excel sheets found)
9/22/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#277 - ORDER denying [272] Motion to Appoint Magistrate Judge; signed by Judge Ronald B. Leighton.(DN)
9/22/2014	KW	0.3	telephone call to discuss need to reschedule deposition .1 email to plaintiff regarding need to reschedule deposition .1 add note to case information .1
9/23/2014	KW	0.3	download discovery produced by defendant .1 update spreadsheet tracking discovery spreadsheet .2
9/23/2014	MD	10	deposition 10
9/23/2014	KW	0.3	md/kw debrief deposition results; discuss extension of discovery time, discuss upcoming depositions of Kellogg executives;
9/23/2014	KW	0.4	AN/KW look through filing cabinets, catalogue contents related to this case, discuss organization plan and determine organization of client files and litigation files .4
9/23/2014	KW	0.5	telephone communication with plaintiff [client] regarding being noticed for a deposition, her work history at Kellogg, her hours worked and her termination .4 add information to case notes .1
9/23/2014	AN	1.5	Review and index client documents
9/23/2014	AN	0.4	AN/KW look through filing cabinets, catalogue contents related to this case, discuss organization plan and determine organization of client files and litigation files .4

Date	Staff	Amount of Time	Description
9/23/2014	MD	0.3	md/kw debrief deposition results; discuss extension of discovery time, discuss upcoming depositions of Kellogg executives;
9/23/2014	DG	2.4	prepare [client] for his deposition 2.2; prep notes re same .2
9/23/2014	DG	0.1	review Orders issued yesterday re extension, class timing .1
9/23/2014	CLER	0.5	organize and File Deposition Transcripts in file cabinet
9/23/2014	KW	0.2	return telephone call of plaintiff add notes to case information
9/23/2014	KW	0.2	telephone call to discuss new deposition date and arrangements to be made to make a deposition schedule .2
9/23/2014	AG	0.3	cross reference Opt-outs that have been filed with the court with list in opt-out folder
9/23/2014	KW	0.3	organize discovery files and paperwork to provide for more efficient access by litigation team .3
9/23/2014	CLER	2.3	organize and File Client and Defendant Documents
9/23/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#278 - ORDER granting [273] Motion for Clarification; Plaintiff's deadline to file a Rule 23 class certification is 45 days after the close of discovery; signed by Judge Ronald B. Leighton.(DN)
9/23/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#279 - ORDER granting [276] Motion for Extension of Time to Complete Discovery Discovery completed by 3/5/2015, signed by Judge Ronald B. Leighton.(DN)
9/23/2014	KW	0.9	MR/KW analyze Itineraries spreadsheet produced by defendant, compare information and data to Itinerary received from plaintiff [client] and determine sections missing from production, revise draft of PLT 5th Request for Production to include data needed relay questions to paralegal meeting with plaintiffs in Ohio
9/23/2014	CLER	0.8	organize and File Client and Defendant Documents
9/23/2014	KW	0.7	review and organize defendant discovery responses
9/23/2014	AG	0.2	Verifies proper format of orders and memorandum in docket file
9/24/2014	MD	2	md defend deposition 2.0
9/24/2014	MR	0.6	MR/KW review production produced to defendant; analyze tracking information needed; develop draft spreadsheet to circulate to staff to implement as a case protocol to track plaintiff document production
9/24/2014	KW	0.3	cm/kw review production file of plaintiff documents produced; research files to verify files produced and media of production
9/24/2014	KW	0.2	draft cover letter of explanation for return of personal documents .1 process mailing of personal documents to plaintiff [client]
9/24/2014	KW	0.2	draft cover letter of explanation for return of personal documents .1 process mailing of personal documents to plaintiff [client]
9/24/2014	MD	3	md defend deposition of [client] 3.0
9/24/2014	KW	0.6	MR/KW review production produced to defendant; analyze tracking information needed; develop draft spreadsheet to circulate to staff to implement as a case protocol to track plaintiff document production
9/24/2014	KW	0.3	review medical files forwarded by plaintiff [client]'s medical group
9/24/2014	MD	0.1	md/kw determine documentation needed from plaintiffs regarding deposition transcript review .1
9/24/2014	JS	0.2	js/kw review document production file to verify plaintiff files produced and date of production .2
9/24/2014	KW	0.4	review all Send6 files to segregate files transmitting Kellogg plaintiff documents to create unique folder to track document production .4

Date	Staff	Amount of Time	Description
9/24/2014	KW	0.1	md/kw determine documentation needed from plaintiffs regarding deposition transcript review .1
9/24/2014	KW	0.2	js/kw review document production file to verify plaintiff files produced and date of production .2
9/24/2014	KW	0.1	scan correspondence and errata sheet received from Atkinson Baker court reporters for plaintiff [client]
9/24/2014	MD	0.1	md/kw discuss need to revise deposition schedule because of unknown availability of named plaintiff [client]
9/24/2014	KW	0.2	scan certified medical records into electronic file .2
9/24/2014	KW	0.1	md/kw discuss need to revise deposition schedule because of unknown availability of named plaintiff [client]
9/24/2014	KW	0.2	mr/kw discuss import of plaintiff's claims regarding vehicle costs they bore to comply with Kellogg vehicle procurement and use program discuss how to identify discovery needed from defendant regarding vehicle costs
9/24/2014	CM	0.3	cm/kw review production file of plaintiff documents produced; research files to verify files produced and media of production
9/24/2014	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker ( transcript reading and signing, errata sheet)
9/24/2014	MR	0.2	mr/kw discuss import of plaintiff's claims regarding vehicle costs they bore to comply with Kellogg vehicle procurement and use program discuss how to identify discovery needed from defendant regarding vehicle costs
9/24/2014	KW	0.4	emails and telephone calls to plaintiff [client] and paralegal J Pickering to inform them of last minute deposition venue change by defendant .3 add new information to deposition tracking spreadsheet .1
9/25/2014	AN	2	Index client documents
9/25/2014	KW	0.2	email explanation of transcript review and Errata process email letter and link to deposition transcript
9/25/2014	MR	0.2	MR/KW look at plaintiff documents produced to defendant which address and support claims in this lawsuit
9/25/2014	MD	0.2	md review case deadlines pursuant to court order extending discovery 0.2
9/25/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#280 - ORDER denying [256] Defendants' Motion to Compel; granting in part and denying in part [257] Defendants' Motion to Compel; granting in part and denying in part [258] Defendants' Motion to Compel; signed by Judge Ronald B. Leighton.(DN)
9/25/2014	MD	0.6	md prepare client for deposition 0.6
9/25/2014	MD	0.4	md prepare for deposition 0.4
9/25/2014	KW	0.2	MR/KW look at plaintiff documents produced to defendant which address and support claims in this lawsuit
9/25/2014	MD	1.5	md defend madewell deposition 1.5
9/25/2014	AN	1.6	Prepare index of client documents
9/25/2014	AN	0.4	Resolve questions regarding deposition transcript revue and Errata sheet responses for plaintiffs: [client][client][client] organize electronic files of deposition information and transcripts to include additional transcripts and exhibits
9/25/2014	KW	0.3	Create spreadsheet to begin to track individual responses of 849 plaintiffs to individual discovery to be propounded by defendant Update client list and contact information list
9/25/2014	KW	0.2	DG/KW plan how to execute individual discovery responses of 849 plaintiffs .2



Date	Staff	Amount of Time	Description
9/25/2014	KW	0.7	DG/MD/MR/MA/KW litigation team meeting to review drafts of 5th and 6th discovery requests to defendant and determine which requests are necessary and useful Review and Propose most effective and efficient ways to organize and execute production of individual discovery of each of 849 plaintiffs plan for depositions of defendants and 30(b)(6) ESI deposition
9/25/2014	KW	0.3	telephone response to online request for information about this case .1 email answers to questions about litigation .1 add information to case notes
9/25/2014	AN	0.1	DG/MD/AR discuss Judge's Order from 9/24/14
9/25/2014	DG	0.2	DG/KW plan how to execute individual discovery responses of 849 plaintiffs .2
9/25/2014	MD	0.1	md review discovery deadlines 0.1
9/25/2014	MD	0.1	DG/MD/AR discuss Judge's Order from 9/24/14
9/25/2014	MD	0.7	DG/MD/MR/MA/KW litigation team meeting to review drafts of 5th and 6th discovery requests to defendant and determine which requests are necessary and useful Review and Propose most effective and efficient ways to organize and execute production of individual discovery of each of 849 plaintiffs plan for depositions of defendants and 30(b)(6) ESI deposition
9/25/2014	MR	0.7	DG/MD/MR/MA/KW litigation team meeting to review drafts of 5th and 6th discovery requests to defendant and determine which requests are necessary and useful Review and Propose most effective and efficient ways to organize and execute production of individual discovery of each of 849 plaintiffs plan for depositions of defendants and 30(b)(6) ESI deposition
9/25/2014	DG	0.1	DG/MD/AR discuss Judge's Order from 9/24/14
9/25/2014	AN	0.7	DG/MD/MR/MA/KW litigation team meeting to review drafts of 5th and 6th discovery requests to defendant and determine which requests are necessary and useful Review and Propose most effective and efficient ways to organize and execute production of individual discovery of each of 849 plaintiffs plan for depositions of defendants and 30(b)(6) ESI deposition
9/25/2014	KW	0.2	telephone call to Atkinson Baker Court reporters to determine why we are not receiving deposition transcripts
9/25/2014	DG	0.7	DG/MD/MR/MA/KW litigation team meeting to review drafts of 5th and 6th discovery requests to defendant and determine which requests are necessary and useful Review and Propose most effective and efficient ways to organize and execute production of individual discovery of each of 849 plaintiffs plan for depositions of defendants and 30(b)(6) ESI deposition
9/25/2014	KW	0.6	AN/KW read through court order Doc. # 280 regarding individual discovery-analyzing section B Review litigation discovery terms and processes for new paralegal Determine tasks to be completed Plan most efficient comprehensive method to track responses
9/25/2014	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker ( transcript ready for reading and signing notice regarding [client]
9/25/2014	KW	0.4	create spreadsheet ot track deposition transcript review, correction and approval .2 add information for [client][client][client] and [client] .2
9/25/2014	CLER	0.2	Scan and file deposition exhibit documents
9/25/2014	KW	0.5	telephone call from plaintiff TW to discuss his deposition transcript -.2 respond to plaintiff's questions about case progress .2 email information to case attorney .1
9/25/2014	AN	0.6	AN/KW read through court order Doc. # 280 regarding individual discovery-analyzing section B Review litigation discovery terms and processes for new paralegal Determine tasks to be completed Plan most efficient comprehensive method to track responses

Date	Staff	Amount of Time	Description
9/25/2014	KW	0.2	organize electronic files of deposition information and transcripts to include additional transcripts and exhibits
9/25/2014	KW	0.2	email explanation of transcript review and Errata process email letter and link to deposition transcript
9/25/2014	KW	0.1	MD/KW Resolve questions regarding how to execute deposition transcript revue and Errata sheet responses for plaintiffs: [client][client][client]
9/25/2014	MD	0.1	MD/KW Resolve questions regarding how to execute deposition transcript revue and Errata sheet responses for plaintiffs: DR, BJ, TW
9/26/2014	MR	0.6	md/mr analyzing electronic versions of Kellogg's model summaries and other data on TMs/RSRs 0.6
9/26/2014	MD	0.1	md/ms discussing whether to refile request to consolidate motion hearing dates 0.1
9/26/2014	AG	0.1	prepare Notice of withdrawal of Consents to Sue for filing
9/26/2014	MS	0.1	md/ms discussing whether to refile request to consolidate motion hearing dates 0.1
9/26/2014	MD	0.6	md review/edit discovery demands 0.6
9/26/2014	MR	0.1	MR/AN Discuss significant issues related to FLSA and Kellogg case
9/26/2014	AN	2	Review Client documents
9/26/2014	AN	2	Index client documents
9/26/2014	AN	1.8	Index client documents
9/26/2014	JS	0.2	spoke with court reporter who asked for transcript ordering prefs
9/26/2014	MD	0.6	md/mr analyzing electronic versions of Kellogg's model summaries and other data on TMs/RSRs 0.6
9/26/2014	AN	0.1	MR/AN Discuss significant issues related to FLSA and Kellogg case
9/26/2014	AN	1.2	Index Client Documents
9/29/2014	KW	0.1	MD/KW determine to send letter to gather information on opt-out request of [client]
9/29/2014	KW	0.3	draft explanation and instructions to deponent [client] email pdf of deposition transcript add information to tracking spreadsheet
9/29/2014	KW	0.7	jp/an/kw organize proof chart issues spreadsheets reflecting data from def. discovery production and client documents and issues-to create a comprehensive proof chart of issues, proof we have and information needed .7
9/29/2014	KW	0.2	draft email to plaintiff who is requesting to be opt-out to clarify reasons for his request .2
9/29/2014	KW	0.1	reply to email from plaintiff [client] regarding review of his deposition
9/29/2014	JP	1.2	reviewed all spreadsheets with proof issues and integrated them into master proof chart
9/29/2014	KW	0.8	reviewed all spreadsheets with proof issues and integrated them into master proof chart
9/29/2014	AN	1.2	reviewed all spreadsheets with proof issues and integrated them into master proof chart
9/29/2014	KW	0.9	read through Court order regarding discovery required for all opt-ins to determine tasks going forward explore information gathered through [ ] Plaintiffs Explore method[s] to gather information needed to respond to information requests from Def develop a plan to execute and respond to def. discovery requests of 849 opt-in plaintiffs
9/29/2014	MD	0.1	MD/KW determine to send letter to gather information on opt-out request of [client]

Date	Staff	Amount of Time	Description
9/29/2014	JP	0.9	read through Court order regarding discovery required for all opt-ins to determine tasks going forward explore information gathered through [ ] Plaintiffs Explore method[s] to gather information needed to respond to information requests from Def develop a plan to execute and respond to def. discovery requests of 849 opt-in plaintiffs
9/29/2014	KW	0.6	Use [ ] responses from each plaintiff to determine which District Managers, Zone Managers, Account Executives would be good to depose create spreadsheet to present data at litigation team meeting
9/29/2014	JP	0.6	Use [ ] responses from each plaintiff to determine which District Managers, Zone Managers, Account Executives would be good to depose create spreadsheet to present data at litigation team meeting
9/29/2014	MD	0.3	MD/KW confer and begin to plan processes to gather individual information to respond to defendant's discovery requests as ordered by Court .3
9/29/2014	KW	0.3	MD/KW confer and begin to plan processes to gather individual information to respond to defendant's discovery requests as ordered by Court .3
9/29/2014	JP	1	JP/KW/AN - Plan how to add relevant issues to Kellogg Proof Chart
9/29/2014	KW	0.7	scan original deposition exhibits .4 review exhibits and add to electronic file .3
9/30/2014	JP	0.3	md/jp/kw determine discovery requests to be included in 5th and 6th document requests determine information to be clarified before pursuing defendant's discovery
9/30/2014	MD	0.3	md/jp/kw determine discovery requests to be included in 5th and 6th document requests determine information to be clarified before pursuing defendant's discovery
9/30/2014	JP	1.7	jp/kw analyze discovery production files; organize discovery production spreadsheets organize Proof Chart folder review spreadsheets and notes regarding proof determine potential corporate deponents identify witnesses for declarations
9/30/2014	AN	2	Review client documents for proof issues
9/30/2014	JP	0.4	JP/KW review spreadsheet of documents to be requested from def. update spreadsheet - eliminating documents provided and adding documents/emails which have not been previously requested
9/30/2014	KW	0.3	md/jp/kw determine discovery requests to be included in 5th and 6th document requests determine information to be clarified before pursuing defendant's discovery
9/30/2014	AN	2	Review client documents for proof issues
9/30/2014	KW	0.4	JP/KW review spreadsheet of documents to be requested from def. update spreadsheet - eliminating documents provided and adding documents/emails which have not been previously requested
9/30/2014	AN	1	Index Client Documents
9/30/2014	MS	0.3	md/kw/jp review discovery requests and production to determine documents to be included in 5th and 6th discovery requests
9/30/2014	AN	1	JP/KW/AN - Plan how to add relevant issues to Kellogg Proof Chart
9/30/2014	MD	0.2	md reviewing discovery list and responding to paralegal about status of requesting documents 0.2
9/30/2014	DG	0.4	email to MS re Ct reporters failing to give us original deposition transcript .1; draft email to James Boudreau re same .1; edit and send email to James Boudreau re same .1; email to MD re next discovery steps .1
9/30/2014	JP	1	JP/KW/AN - Plan how to add relevant issues to Kellogg Proof Chart

Date	Staff	Amount of Time	Description
9/30/2014	KW	1	JP/KW/AN - Thoroughly read litigation proof chart-identifying sections which require document proof Plan how to add relevant issues to Kellogg Proof Chart
9/30/2014	MD	0.3	md call with client about deposition transcript 0.3
9/30/2014	MD	0.1	md/jp/kw attempt to finalize deposition schedule of plaintiff [client]
9/30/2014	JP	0.1	md/jp/kw attempt to finalize deposition schedule of plaintiff [client]
9/30/2014	KW	0.1	md/jp/kw attempt to finalize deposition schedule of plaintiff [client]
9/30/2014	MS	0.3	md/dg/ms/jp discussing individualized discovery order and how to proceed in efficient manner 0.3
9/30/2014	JP	0.3	md/dg/ms/jp discussing individualized discovery order and how to proceed in efficient manner 0.3
9/30/2014	MD	0.3	md/dg/ms/jp discussing individualized discovery order and how to proceed in efficient manner 0.3
9/30/2014	CLER	1	File deposition exhibit documents
9/30/2014	DG	0.3	md/dg/ms/jp discussing individualized discovery order and how to proceed in efficient manner 0.3
10/1/2014			DG/MD/JP/K/ AN Complete discussion of information needed from former managers analyze information we have about direct delivery system and Cross Dock system determine information needed to understand the defendant's processes as they impact plaintiffs and plaintiffs' claims
10/1/2014	DG	0.9	draft proof chart .5
10/1/2014			DG/MD/JP/K/ AN Complete discussion of information needed from former managers analyze information we have about direct delivery system and Cross Dock system determine information needed to understand the defendant's processes as they impact plaintiffs and plaintiffs' claims
10/1/2014	MD	0.9	
10/1/2014	KW	0.3	telephone call to deponent to let him know deposition has been postponed add information to case notes .1 add information to deposition tracking spreadsheet
10/1/2014			DG/MD/JP/K/ AN Complete discussion of information needed from former managers analyze information we have about direct delivery system and Cross Dock system determine information needed to understand the defendant's processes as they impact plaintiffs and plaintiffs' claims
10/1/2014	AN	0.9	
10/1/2014			DG/MD/JP/K/ AN Complete discussion of information needed from former managers analyze information we have about direct delivery system and Cross Dock system determine information needed to understand the defendant's processes as they impact plaintiffs and plaintiffs' claims
10/1/2014	JP	0.9	
10/1/2014	MR	0.2	mr/kw explore most effective options to notate proof chart with supportive documents
10/1/2014	KW	0.2	mr/kw explore most effective options to notate proof chart with supportive documents
10/1/2014			review deposition transcript tracking spreadsheet to determine which deponents have review transcripts, which have received transcripts but not responded, which need transcripts to be reviewed. update spreadsheet with current information email deponents who need to respond
10/1/2014	KW	0.4	
10/1/2014	KW	0.5	JP/AN/KW review discovery identified as evidence of claims begin to add to Proof Chart
10/1/2014	KW	0.1	respond to email from deponent regarding review of deposition transcript
10/1/2014			email to deponent outlining: responsibility to read transcript of deposition; opportunity to make corrections and timeline for deposition review and correction
10/1/2014	KW	0.2	

Date	Staff	Amount of Time	Description
10/1/2014	KW	0.4	Research Defendant-produced documents to find Sales Training Guide referenced in KUSA training presentation .3 email litigation team re lack of production of Sales Training Guide and possible need to request-
10/1/2014	KW	0.2	email to deponent outlining: responsibility to read transcript of deposition; opportunity to make corrections and timeline for deposition review and correction
10/1/2014	KW	1.3	DG/MD/JP/AN/KW/MR Litigation team meeting: review discovery requirements as ordered by the court Explore demands from each plaintiff-- information and documents Determine most effective and efficient process to meet court's requirements begin to identify information to be gathered from interviewing former managers
10/1/2014	JP	0.1	jp/kw discuss plan to add to and expand Proof Chart development .1
10/1/2014	CLER	0.2	AN/KW review latest discovery demands received from defendant determine most efficient method to track and file documents
10/1/2014	AN	1	Review indexed client documents for proof issues
10/1/2014	CLER	0.2	AN/KW review latest discovery demands received from defendant determine most efficient method to track and file documents
10/1/2014	KW	0.1	jp/kw discuss plan to add to and expand Proof Chart development .1
10/1/2014	JP	0.5	JP/AN/KW review discovery identified as evidence of claims begin to add to Proof Chart
10/1/2014	AN	0.5	JP/AN/KW review discovery identified as evidence of claims begin to add to Proof Chart
10/1/2014	AN	0.5	Scan Def. Requests for Docs, RFAs, Rogs
10/1/2014	KW	0.3	organize electronic files of documents produced to defendant in preparation for document production for all of 849 plaintiffs
10/1/2014	AN	1.5	Review client documents for proof issues
10/1/2014	DG	0.2	md/dg call with defense counsel about discovery 0.2
10/1/2014	JP	1.3	DG/MD/JP/AN/KW/MR Litigation team meeting: review discovery requirements as ordered by the court Explore demands from each plaintiff-- information and documents Determine most effective and efficient process to meet court's requirements begin to identify information to be gathered from interviewing former managers
10/1/2014	MD	0.2	md/dg call with defense counsel about discovery 0.2
10/1/2014	MR	1.3	DG/MD/JP/AN/KW/MR Litigation team meeting: review discovery requirements as ordered by the court Explore demands from each plaintiff-- information and documents Determine most effective and efficient process to meet court's requirements begin to identify information to be gathered from interviewing former managers
10/1/2014	MD	1.3	DG/MD/JP/AN/KW/MR Litigation team meeting: review discovery requirements as ordered by the court Explore demands from each plaintiff-- information and documents Determine most effective and efficient process to meet court's requirements begin to identify information to be gathered from interviewing former managers
10/1/2014	AN	1.3	DG/MD/JP/AN/KW/MR Litigation team meeting: review discovery requirements as ordered by the court Explore demands from each plaintiff-- information and documents Determine most effective and efficient process to meet court's requirements begin to identify information to be gathered from interviewing former managers

Date	Staff	Amount of Time	Description
10/1/2014	DG	1.3	DG/MD/JP/AN/KW/MR Litigation team meeting: review discovery requirements as ordered by the court Explore demands from each plaintiff-- information and documents Determine most effective and efficient process to meet court's requirements begin to identify information to be gathered from interviewing former managers
10/1/2014	KW	0.9	DG/MD/JP/K/ AN Complete discussion of information needed from former managers analyze information we have about direct delivery system and Cross Dock system determine information needed to understand the defendant's processes as they impact plaintiffs and plaintiffs' claims
10/2/2014	AN	0.3	AN/KW create a draft of an update to the website posting for this case to meet our responsibility to provide current information to opt-ins
10/2/2014	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker ([client]transcript ready for reading and signing, errata sheet)
10/2/2014	KW	0.3	AN/KW create a draft of an update to the website posting for this case to meet our responsibility to provide current information to opt-ins
10/2/2014	MD	0.2	md/kw determine work needed to prepare for change in deposition schedule and rescheduled deposition of [client]
10/2/2014	AN	0.5	Index client documents
10/2/2014	KW	0.2	md/kw determine work needed to prepare for change in deposition schedule and rescheduled deposition of [client]
10/2/2014	JP	0.2	JP/KW determine next steps regarding adding hyperlinks of substantiating documents to proof chart in light of proof chart revisions .2
10/2/2014	AN	2	Review client documents for proof issues
10/2/2014	KW	0.2	JP/KW determine next steps regarding adding hyperlinks of substantiating documents to proof chart in light of proof chart revisions .2
10/2/2014	DG	0.3	draft email schedule proposal to def counsel .3
10/2/2014	AN	1	Review Client Documents for proof issues
10/2/2014	MD	0.1	md call with defense counsel about meeting for discovery 0.1
10/2/2014	KW	0.4	telephone call to deponent [client] to schedule deposition .1 determine best time for deposition preparation call-coordinating deponent's work schedule and attorney's schedule .2 add information to calendar, electronic case notes and email information to attorney .1
10/2/2014	AN	3	Review client documents for proof issues
10/2/2014	MD	0.1	md coordinating deposition in Orlando
10/3/2014	MD	0.2	md reviewing 30b6 deposition transcript for job duties of account executive 0.2
10/3/2014	AN	0.1	Review proposed updates to website
10/3/2014	AN	2	Review deposition transcript for proof issues
10/3/2014	MD	2.5	md researching when a sale is made for the purposes of Kellogg 2.5
10/3/2014	MD	0.5	md researching videos describing Kellogg's and the job duties for TMs/Acct Execs/RSRs/ and other sales employees 0.5
10/3/2014	MR	1	md/mr discussing how to get information about various positions in order to assess who is making sales and the types of agreements occurring at the national level 1.0
10/3/2014	MD	0.3	md drafting list of documents to request to show employees other than TMs/RSRs negotiated the sale of Kellogg's products 0.3
10/3/2014	CLER	0.7	File client documents in folders
10/3/2014	MD	1	md/mr discussing how to get information about various positions in order to assess who is making sales and the types of agreements occurring at the national level 1.0
10/3/2014	AN	3.5	Review clients documents for proof issues



Date	Staff	Amount of Time	Description
10/3/2014	AN	0.8	Index client documents
10/6/2014	KW	0.1	email Notice of deposition to deponent [client] .1
10/6/2014	KW	0.6	initial intake interview with potential opt-in .4 open case contact .1 email pdf of consent form potential opt-in .1
10/6/2014	JP	0.8	JP/MR examine Def employee training production regarding description of the company sales cycle and role played by TM
10/6/2014	DG	0.2	emails re plt being sued for accident while employed by Kellogg .2
10/6/2014	MD	0.1	md/jp discussing severance agreement with opt-in plaintiff 0.1
10/6/2014	CLER	0.1	create PDF format of document recd from client [client]
10/6/2014	JP	0.1	md/jp discussing severance agreement with opt-in plaintiff 0.1
10/6/2014	KW	0.2	email documents needed by deponent before deposition preparation call .2
10/6/2014	KW	0.5	initial intake interview .4 organize information and add it to case notes .1
10/6/2014	KW	0.1	MD/KW discuss impact of confidentiality order on sharing defendant produced document with deponent .1
10/6/2014	KW	0.3	research docket and Order related to dealing with confidential information to determine what can be shared with plaintiff deponent .2 relay pertinent sections to attorney for review .1
10/6/2014	MD	0.1	MD/KW discuss impact of confidentiality order on sharing defendant produced document with deponent .1
10/6/2014	MR	0.8	JP/MR examine Def employee training production regarding description of the company sales cycle and role played by TM
10/7/2014	AN	0.6	Review client documents for proof issues
10/7/2014	MD	0.2	md/kw review plaintiff and defendant discovery requests since beginning of litigation; determine which are needed to be printed and brought to discovery conference scheduled for 10/8/14
10/7/2014	CLER	0.2	prepare welcome letter to new client
10/7/2014	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker ( transcripts of [client])
10/7/2014	KW	0.2	md/kw review plaintiff and defendant discovery requests since beginning of litigation; determine which are needed to be printed and brought to discovery conference scheduled for 10/8/14
10/7/2014	CLER	0.1	Data Entry of contact information of new client
10/7/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/7/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#281 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Darryl A. Johnson Sr.)(Dunn, Matt)
10/7/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Darryl A. Johnson Sr.)
10/7/2014	MD	2	md call with client in preparation for deposition 2.0
10/7/2014	AN	3.2	Review defendant and client documents for proof issues
10/7/2014	AN	1	KW/AN Prepare documents for attorney's meeting with def. counsel
10/7/2014	KW	0.8	dg/md/jp/an/mr/kw litigation team meeting to prepare for meeting with defense counsel scheduled for tomorrow to attempt to resolve discovery disputes
10/7/2014	DG	0.8	dg/md/jp/an/mr/kw litigation team meeting to prepare for meeting with defense counsel scheduled for tomorrow to attempt to resolve discovery disputes

Date	Staff	Amount of Time	Description
10/7/2014	AN	0.8	dg/md/jp/an/mr/kw litigation team meeting to prepare for meeting with defense counsel scheduled for tomorrow to attempt to resolve discovery disputes
10/7/2014	MR	0.1	retrieve flash drive used for Kellogg depositions from atty MD
10/7/2014	JP	0.8	dg/md/jp/an/mr/kw litigation team meeting to prepare for meeting with defense counsel scheduled for tomorrow to attempt to resolve discovery disputes
10/7/2014	MD	0.8	dg/md/jp/an/mr/kw litigation team meeting to prepare for meeting with defense counsel scheduled for tomorrow to attempt to resolve discovery disputes
10/7/2014	KW	0.9	jp/an/kw review latest revision of proof chart to determine documents needed for proof determine most effective spreadsheet construction to annotate discovery and funnel useful documents into proof chart review discovery produced by defendant and determine most efficient method to review and select proof documents
10/7/2014	MR	0.8	dg/md/jp/an/mr/kw litigation team meeting to prepare for meeting with defense counsel scheduled for tomorrow to attempt to resolve discovery disputes
10/7/2014	AN	0.9	jp/an/kw review latest revision of proof chart to determine documents needed for proof determine most effective spreadsheet construction to annotate discovery and funnel useful documents into proof chart review discovery produced by defendant and determine most efficient method to review and select proof documents
10/7/2014	JP	0.9	jp/an/kw review latest revision of proof chart to determine documents needed for proof determine most effective spreadsheet construction to annotate discovery and funnel useful documents into proof chart review discovery produced by defendant and determine most efficient method to review and select proof documents
10/7/2014	KW	1	Prepare documents for attorney's meeting with def. counsel
10/8/2014	AN	0.2	File written deposition transcripts in file cabinets
10/8/2014	KW	0.1	draft email to follow-up on deposition transcript changes plaintiff [client] indicated would be needed.
10/8/2014	MA	0.2	call from client [client] re: case updates
10/8/2014	AN	2	Review deposition transcript and client documents for proof issues
10/8/2014	AN	0.75	Review client documents for proof issues
10/8/2014	KW	0.3	respond to plaintiff [client]'s corrections to deposition transcript .1 forward corrections to attorney .1 add information to tracking spreadsheet
10/8/2014	MR	0.4	MR/AN devise plan to sort indexed documents by Bates number
10/8/2014	MD	9	round trip travel to NYC for discovery conference 5.5; conference re discovery 2.5; meeting prep during lunch 1
10/8/2014	AN	0.4	MR/AN devise plan to sort indexed documents by Bates number
10/8/2014	KW	9	round trip travel to NYC for discovery conference 5.5; conference re discovery 2.5; meeting prep during lunch 1
10/8/2014	JS	0.1	call re: cannot find case page on website
10/8/2014	CLER	0.1	create PDF format of documents recd from D. ([client]'s first set of rogs, first request for docs and first request for admissions)
10/8/2014	KW	0.1	draft email to litigation team regarding plt's request to opt-out and how to proceed
10/8/2014	AN	2	Use Renaming Utility Software to rename Def. Bates Stamped documents

Date	Staff	Amount of Time	Description
10/8/2014	KW	0.3	print def. responses to PLT discovery requests and complete attorney files in preparation for discovery conference with defendant .3
10/8/2014	DG	9	round trip travel to NYC for discovery conference 5.5; conference re discovery 2.5; meeting prep during lunch 1
10/9/2014	KW	0.4	jp/an/kw discuss results of meeting with defendant's counsel regarding discovery to be required of plaintiffs .4
10/9/2014	MD	1	md prepare client for deposition 1.0
10/9/2014	AN	1	Review def. documents for proof issues
10/9/2014	AN	0.4	jp/an/kw discuss results of meeting with defendant's counsel regarding discovery to be required of plaintiffs .4
10/9/2014	JP	0.4	jp/an/kw discuss results of meeting with defendant's counsel regarding discovery to be required of plaintiffs .4
10/9/2014	KW	0.4	mr/kw discuss results of meeting with defendant's counsel regarding discovery to be required of plaintiffs; confer regarding details of upcoming IT deposition
10/9/2014	DG	0.2	review proof chart organization .1; email to team re what additional should be in it .1
10/9/2014	KW	2.2	JP/AN/KW analyze Proof chart, revised Proof Chart and edited Proof Chart- integrate all revisions into one proof chart for litigation team to review, edit and circulate for use be all to track proof of issues
10/9/2014	AN	1.5	Review client documents
10/9/2014	MR	0.4	mr/kw discuss results of meeting with defendant's counsel regarding discovery to be required of plaintiffs; confer regarding details of upcoming IT deposition
10/9/2014	JP	2.2	JP/AN/KW analyze Proof chart, revised Proof Chart and edited Proof Chart- integrate all revisions into one proof chart for litigation team to review, edit and circulate for use be all to track proof of issues
10/9/2014	AN	2.2	JP/AN/KW analyze Proof chart, revised Proof Chart and edited Proof Chart- integrate all revisions into one proof chart for litigation team to review, edit and circulate for use be all to track proof of issues
10/9/2014	KW	0.3	work with deponent by telephone to complete Errata sheet for one change in deposition transcript .3
10/10/2014	AN	2	Index and Review client documents for proof issues
10/10/2014	AN	1	Review client documents for proof issues
10/10/2014	AN	1	Rename and index def. documents
10/14/2014	MD	0.2	md prepare to defend deposition in FL 0.2
10/14/2014	CLER	0.2	create PDF format of documents recd from client ( [client] - Errata sheet/signature page of depo)
10/14/2014	MD	0.5	md reviewing expenses from Kellogg deposition trip 0.5
10/14/2014	KW	0.2	md/kw develop plan to track receipt and responses to transcript review
10/14/2014	MD	0.2	md/kw develop plan to track receipt and responses to transcript review
10/14/2014	KW	0.5	initial intake call from putative class member to discuss questions regarding claims and ramifications of joining this lawsuit .4 add information to case notes .1
10/14/2014	AN	0.3	JP/AN confer re methods to review client information for accuracy
10/14/2014	KW	0.2	print Opt-In Discovery requests .1 review and add questions and comments in preparation for litigation team meeting scheduled for 10/15 .1
10/14/2014	KW	0.4	review email from plaintiff [client] deposition transcript Errata changes needed .1 print pages and highlight for attorney review .3
10/14/2014	JP	0.9	JP/KW/CM discuss status and procedure for cross-checking and validating consents to sue with TM, pacer and docket file (.9)

Date	Staff	Amount of Time	Description
10/14/2014	KW	0.3	scan completed errata sheet and notarized signature sheet- update electronic file of deponent responses email to attorney
10/14/2014	JP	0.3	JP/AN confer re methods to review client information for accuracy
10/14/2014	KW	0.4	telephone discussion regarding corrections to deposition transcript .2 add information to case notes .1 scan errata sheet and notarized sheet .1
10/14/2014	CM	0.9	JP/KW/CM discuss status and procedure for cross-checking and validating consents to sue with TM, pacer and docket file (.9)
10/14/2014	KW	0.9	JP/KW/CM discuss status and procedure for cross-checking and validating consents to sue with TM, pacer and docket file (.9)
10/14/2014	MD	7.5	md travel to Orlando FL for deposition 7.5
10/14/2014	AN	1.7	Review def. documents for proof issues
10/14/2014	KW	0.1	correct contact information in electronic file of plaintiff TH
10/14/2014	JP	0.5	jp/kw review issues related to 83 plaintiffs identified for exclusion by defendant .2 create agenda for litigation team meeting scheduled for tomorrow .2 discuss ongoing document review, notation and indexing project to determine what is needed to be accomplished .1
10/14/2014	CLER	0.8	Verify client data in Time Matters
10/14/2014	KW	0.5	jp/kw review issues related to 83 plaintiffs identified for exclusion by defendant .2 create agenda for litigation team meeting scheduled for tomorrow .2 discuss ongoing document review, notation and indexing project to determine what is needed to be accomplished .1
10/15/2014	KW	0.6	prepare ERRATA sheet from information provided by deponent [client] .4 email with instructions to deponent .2
10/15/2014	DG	0.2	draft website statement re discovery status and late consents for class members .2
10/15/2014	KW	0.4	finalize website posting incorporating revisions of litigation team .4
10/15/2014	MD	4	md defend deposition 4.0
10/15/2014	MD	1.5	md prepare client for deposition 1.5
10/15/2014	AN	0.8	dg/jp/an/kw litigation team meeting to determine defendants representatives to depose, review defendant's discovery requests, update website posting, determine what information is needed to verify defendant's exclusion list
10/15/2014	JP	0.8	dg/jp/an/kw litigation team meeting to determine defendants representatives to depose, review defendant's discovery requests, update website posting, determine what information is needed to verify defendant's exclusion list
10/15/2014	DG	0.8	dg/jp/an/kw litigation team meeting to determine defendants representatives to depose, review defendant's discovery requests, update website posting, determine what information is needed to verify defendant's exclusion list
10/15/2014	CM	0.1	JP/KW/CM discuss next steps for CTS reconciliation process (.1)
10/15/2014	KW	0.1	JP/KW/CM discuss next steps for CTS reconciliation process (.1)
10/15/2014	JP	0.1	JP/KW/CM discuss next steps for CTS reconciliation process (.1)
10/15/2014	KW	0.8	dg/jp/an/kw litigation team meeting to determine defendants representatives to depose, review defendant's discovery requests, update website posting, determine what information is needed to verify defendant's exclusion list
10/15/2014	CLER	1.5	Verify client data in Time Matters
10/15/2014	KW	0.4	telephone call from plaintiff discussing his retiring from Kellogg, his filing an EEOC suit on 2 complaints and his interaction with Kellogg HR department .4
10/15/2014	MD	1.5	md meet with client after deposition to digest how deposition went 1.5
10/15/2014	MD	8	md travel from Orlando - defending deposition 8.5
10/15/2014	AN	1	Prepare response to Def. list of opt-in Discovery Requests
10/15/2014	MD	1	md attend deposition with client 1.0

Date	Staff	Amount of Time	Description
10/16/2014			research information regarding cost of deposition transcripts for plaintiff depositions of [client][client][client][client][client][client] and [client] .4 email information to attorneys for decision regarding which transcripts are needed in what form .1
10/16/2014	KW	0.5	
10/16/2014	CLER	0.1	create PDF format of documents recd from client ([client]- Resume and notes)
10/16/2014	MA	0.2	posting update to website and Facebook page to keep clients and putative class members informed
10/16/2014			telephone call from deponent plaintiff Kk to discuss process to read and make any changes to deposition transcript email information to attorney .1 add information to deposition tracking spreadsheet .1
10/16/2014	KW	0.4	
10/16/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue Attachments: # (1) Consent to Sue of Belinda Sue Mills)
10/16/2014	MA	0.1	kw/ma review website update in preparation for posting
10/16/2014	KW	0.3	read and add edits to draft of Kellogg discovery requests .3
10/16/2014			telephone to Atkinson Baker court reporter service to discuss cost of transcripts needed .2
10/16/2014	KW	0.2	
10/16/2014	MD	0.5	md review expenses and submit for reimbursement 0.5
10/16/2014	CLER	0.1	Verify client data in Time Matters
10/16/2014	KW	0.1	kw/ma review website update in preparation for posting
10/16/2014			telephone to Elite Transcripts court reporter service to discuss cost of transcripts needed .2
10/16/2014	KW	0.2	
10/16/2014			Transfer documents recd from ECF system to docket file and create file copy(Docket#282 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Belinda Sue Mills)(Dunn, Matt)
10/16/2014	CLER	0.1	
10/16/2014	MD	0.5	md collect exhibits from deposition 0.5
10/16/2014			telephone discussion of ex-Kellogg management employees who may be willing to be witnesses in support of plaintiffs' claims .2 add information to spreadsheet tracking witnesses .1 email lead paralegal re information .1
10/16/2014	KW	0.4	
10/16/2014			draft notes of meeting regarding procedures/process and protocols to verify consents filed and accuracy of downloaded docket circulate to JP and CM
10/16/2014	KW	0.3	
10/16/2014			md/kw debrief regarding [client] deposition; review litigation team meeting notes, tasks; determine work needed to proceed to verify Exclusion list sent by defendant .5
10/16/2014	MD	0.5	
10/16/2014	MA	0.1	call from opt-in [client] re: contact information
10/16/2014			copy, Bates Stamp and produce documents submitted by PLT deponent [client] .4
10/16/2014	KW	0.4	
10/16/2014			md/kw debrief regarding [client] deposition; review litigation team meeting notes, tasks; determine work needed to proceed to verify Exclusion list sent by defendant .5
10/16/2014	KW	0.5	
10/16/2014	AN	2	Scan and file plaintiff transcript exhibits
10/16/2014			identify deponents for whom we do not have exhibits .2 follow-up with staff to locate and scan exhibits .1
10/16/2014	KW	0.3	
10/16/2014			respond to plaintiff's questions regarding his deceased wife's claims in this case .2 add information to case notes .1
10/16/2014	KW	0.3	
10/16/2014	DG	0.1	md/dg discussing how [client] deposition went 0.1
10/16/2014	MD	0.1	md/dg discussing how [client] deposition went 0.1
10/16/2014	CLER	0.2	prepare welcome letter to new client
10/16/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/16/2014	AN	1	Prepare response to Def. list of opt-in discovery questions
10/16/2014	CLER	0.1	Data Entry of contact information of new client

Date	Staff	Amount of Time	Description
10/17/2014	JS	0.1	plt [client] called for KW re: transcript--reviewing and returning call--sent to KW vm
10/17/2014	CM	0.5	review notes on CTS checking (.2), organize work on TM/pacer comparison (.3)
10/17/2014	AG	0.2	prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/17/2014	CLER	0.1	Data Entry of contact information of new client
10/17/2014	CLER	0.1	create PDF format of documents recd from client (Marriage/death certificate [client])
10/17/2014	CLER	0.2	prepare welcome letter to new client
10/17/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#283 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Debra Beddo)(Dunn, Matt)
10/17/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Debra Beddo)
10/20/2014	KW	0.4	telephone discussion with plaintiff AP concerning his request to be removed from this case .2 add information to case notes .1 email information to litigation team
10/20/2014	KW	0.1	draft email to get a check sent to pay for transcripts for 5 plaintiff deponents ; [client][client][client][client][client]
10/20/2014	KW	0.2	MD/KW clarify information regarding deposition transcript costs .1 clarify discrepancies in transcript identified by deponent [client]
10/20/2014	KW	0.2	add information to deposition transcript review tracking worksheet- update to determine tasks needing completion and contacts to be made to plaintiffs
10/20/2014	KW	0.1	draft email to deponent [client] regarding completing transcript review process .1
10/20/2014	KW	0.2	scan deposition transcript approval emailed to us by deponent [client] add to electronic file
10/20/2014	KW	0.4	read through case intake notes of plaintiff [client] to determine if his employment was in a covered position during SOL of lawsuit .2 telephone call to plaintiff [client] to schedule appointment for additional fact finding interview .1 email information needed to plaintiff [client] .1
10/20/2014	KW	0.3	telephone call from plaintiff [client] regarding terminating employment at Kellogg update contact information in files
10/20/2014	KW	0.2	attempts to call plaintiff regarding request to opt-out .1 research to find working telephone number .1
10/20/2014	MD	0.3	md preparing list of outstanding discovery 0.3
10/20/2014	MD	0.2	md reviewing draft document requests 0.2
10/20/2014	KW	0.1	email deposition recording services to get updated pricing for PText of transcripts-.1
10/20/2014	KW	0.8	use ABBY Fine Reader to convert pdf of Exclusion list to excel sheet for sorting and organization .4 compare Exclusion list to Def. document production to identify those on list for whom we have received personnel files .4
10/21/2014	KW	0.8	jp/kw edit, revise, develop questions regarding draft simplified discovery to all plaintiffs
10/21/2014	AN	0.1	AN/KW plan agenda for 10-22-14 litigation team meeting .1
10/21/2014	KW	0.4	review litigation status and needs create agenda for litigation team meeting
10/21/2014	KW	0.1	AN/KW plan agenda for 10-22-14 litigation team meeting .1
10/21/2014	MR	0.3	locate and reexamine Def document and comments regarding training videos .2, email to atty MD about same .1
10/21/2014	CLER	0.2	File documents



Date	Staff	Amount of Time	Description
10/21/2014	KW	0.4	research files for template of a letter to confirm withdrawal of consent to sue and ramifications of withdrawal for plaintiff [client]
10/21/2014	MR	0.6	mr/jp/kw assess simplified discovery document in light of what would be necessary to integrate the interrogatory [ ], Merge fields process to produce final document for plaintiff approval and signature make revisions as needed
10/21/2014	KW	0.2	review latest version of Def. Discovery Requests for each plaintiff .1 add revisions and comments .1
10/21/2014	MR	0.4	further review of draft simplified interrog output .2, email to attys/para regarding same .2
10/21/2014	JP	0.6	mr/jp/kw assess simplified discovery document in light of what would be necessary to integrate the interrogatory [ ], Merge fields process to produce final document for plaintiff approval and signature make revisions as needed
10/21/2014	JP	0.8	jp/kw edit, revise, develop questions regarding draft simplified discovery to all plaintiffs
10/21/2014	KW	0.6	mr/jp/kw assess simplified discovery document in light of what would be necessary to integrate the interrogatory [ ], Merge fields process to produce final document for plaintiff approval and signature make revisions as needed
10/21/2014	MD	1	MD/MR review and edit draft 5th and 6th document requests for production
10/21/2014	MR	1	MD/MR review and edit draft 5th and 6th document requests for production
10/21/2014	AN	0.1	Discuss and send email re Def. Discovery opt-in questions
10/22/2014	KW	0.2	telephone call to plaintiff [client] to gather information to verify or challenge her being on Exclusion list from Def. add information to case notes
10/22/2014	KW	0.5	telephone call to plaintiff [client] who is on Def. Exclusion list to gather employment history .2 add information to case notes .1 email information to litigation team .1 update Exclusion list tracking spreadsheet .1
10/22/2014	KW	0.3	telephone call to plaintiff [client] to clarify dates of employment and job title email to seek information to determine if she should be excluded --she is on Def. Exclusion list- add information to case notes .1
10/22/2014	KW	0.1	telephone call to state class representative deponent to determine current residence for purposes of scheduling a deposition .1
10/22/2014	MD	0.1	md call with defense counsel about discovery 0.1
10/22/2014	KW	0.2	Research case information files for plaintiff [client] to clarify dates of employment and job title during claims period of this case email to plaintiff regarding information needed to clarify dates of employment and job title during claims period of this case
10/22/2014	KW	0.3	review Intake note in Time Matters .1 add information to spreadsheet tracking Exclusion List Information add to case notes
10/22/2014	KW	0.5	telephone call to deponent [client] to follow-up on getting a completed, signed and notarized Errata sheet .1 email a second Errata Sheet -prepared with his corrections-to plaintiff deponent for signature .2 add information to case notes .1 notify attorney of contacts and results .1
10/22/2014	KW	0.3	telephone call to plaintiff [client] regarding his dates of employment at Kellogg to determine if he should be excluded from this lawsuit .2 add information to case notes .1
10/22/2014	CLER	0.2	Index and file client documents
10/22/2014	KW	0.4	telephone call to plaintiff [client] to clarify dates of employment and job title email to seek information to determine if he should be excluded --he is on Def. Exclusion list- add information to case notes .1

Date	Staff	Amount of Time	Description
10/22/2014	KW	0.5	telephone call to plaintiff [client] who is on Def. Exclusion list to gather employment history .2 add information to case notes .1 email information to litigation team .1 update Exclusion list tracking spreadsheet .1
10/22/2014	KW	0.5	review email correspondence with court reporter services to determine prices of various versions of transcripts of plaintiff deponents .2 review correspondence and notes of discussions with litigation team to determine what we need to order .2 email request for transcripts to Atkinson-Baker Inc. .1
10/22/2014	MD	0.2	md/kw research docket to determine exact tolling period .1 verify SOL period for plaintiff [client] .1
10/22/2014	KW	0.3	Review case notes to determine information required to verify or challenge def. Exclusion list .1 telephone call to plaintiff [client] to clarify dates of employment and job title .1 add information to case notes .1
10/22/2014	KW	0.2	md/kw research docket to determine exact tolling period .1 verify SOL period for plaintiff [client] .1
10/22/2014	KW	0.4	review case notes to determine if plaintiff [client] should be on Def. Exclusion List .2 email to plaintiff to obtain exact date of termination .1 add information to case notes .1
10/22/2014	KW	0.3	telephone call to plaintiff [client] to clarify dates of employment and job title email to seek information to determine if she should be excluded --she is on Def. Exclusion list- add information to case notes .1
10/22/2014	KW	0.3	telephone call to plaintiff [client] to clarify dates of employment and job title email to seek information to determine if she should be excluded --she is on Def. Exclusion list- add information to case notes .1
10/22/2014	KW	0.3	telephone call to plaintiff [client] to clarify dates of employment and job title email to seek information to determine if he should be excluded --he is on Def. Exclusion list- add information to case notes .1
10/23/2014	MR	0.3	MD/MR/JP/AN/KW determine progress and recording of interviews with potential witnesses; determine need for defendant to provide list of individual identifiers for plaintiffs to be used to understand reports produced by defendant
10/23/2014	MD	0.3	MD/MR/JP/AN/KW determine progress and recording of interviews with potential witnesses; determine need for defendant to provide list of individual identifiers for plaintiffs to be used to understand reports produced by defendant
10/23/2014	JP	0.3	MD/MR/JP/AN/KW determine progress and recording of interviews with potential witnesses; determine need for defendant to provide list of individual identifiers for plaintiffs to be used to understand reports produced by defendant
10/23/2014	AN	0.3	MD/MR/JP/AN/KW determine progress and recording of interviews with potential witnesses; determine need for defendant to provide list of individual identifiers for plaintiffs to be used to understand reports produced by defendant
10/23/2014	KW	0.4	md/kw analyze and revise proposed plaintiff discovery requests .4
10/23/2014	AN	0.2	Review updated Def. questions for opt-ins
10/23/2014	JS	0.1	call from plt [client] returning KW msg
10/23/2014	MD	0.2	md call clients about depositions 0.2
10/23/2014	KW	0.4	download deposition transcripts for [client][client][client][client][client].2 update electronic file of plaintiffs' deposition transcripts .1 email information to litigation team .1

Date	Staff	Amount of Time	Description
10/23/2014	MD	0.4	md/kw analyze and revise proposed plaintiff discovery requests .4
10/23/2014	KW	1.1	DG/MD/MR/JP/AN/KW litigation team meeting-analyze, revise and edit proposed discovery plaintiffs to be completed by 849 plaintiffs; determine procedure for securing responses, processing responses and producing responses to defendant 1.1
10/23/2014	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker (submitted corrections)
10/23/2014	KW	1.1	MR/KW Go through PLT 6th document request to determine what is essential to have for all plaintiffs, what is needed for a sample and what is not essential
10/23/2014	MD	0.4	md editing defendant's discovery requests 0.4
10/23/2014	DG	0.4	dg/md discuss edits to discovery demands by def of opt-ins .1; edit def discovery to all opt-ins .3
10/23/2014	KW	0.4	initial intake interview with plaintiff who left Kellogg under extreme stress .3 add information to case notes
10/23/2014	AN	1.1	DG/MD/MR/JP/AN/KW litigation team meeting-analyze, revise and edit proposed discovery plaintiffs to be completed by 849 plaintiffs; determine procedure for securing responses, processing responses and producing responses to defendant 1.1
10/23/2014	JP	1.1	DG/MD/MR/JP/AN/KW litigation team meeting-analyze, revise and edit proposed discovery plaintiffs to be completed by 849 plaintiffs; determine procedure for securing responses, processing responses and producing responses to defendant 1.1
10/23/2014	DG	1.1	DG/MD/MR/JP/AN/KW litigation team meeting-analyze, revise and edit proposed discovery plaintiffs to be completed by 849 plaintiffs; determine procedure for securing responses, processing responses and producing responses to defendant 1.1
10/23/2014	MD	0.1	dg/md discuss edits to discovery demands by def of opt-ins .1
10/23/2014	MR	1.1	DG/MD/MR/JP/AN/KW litigation team meeting-analyze, revise and edit proposed discovery plaintiffs to be completed by 849 plaintiffs; determine procedure for securing responses, processing responses and producing responses to defendant 1.1
10/23/2014	MD	1.1	DG/MD/MR/JP/AN/KW litigation team meeting-analyze, revise and edit proposed discovery plaintiffs to be completed by 849 plaintiffs; determine procedure for securing responses, processing responses and producing responses to defendant 1.1
10/23/2014	MR	1.1	MR/KW Go through PLT 6th document request to determine what is essential to have for all plaintiffs, what is needed for a sample and what is not essential
10/23/2014	KW	0.3	MD/MR/JP/AN/KW determine progress and recording of interviews with potential witnesses; determine need for defendant to provide list of individual identifiers for plaintiffs to be used to understand reports produced by defendant
10/24/2014	MD	0.3	md editing and reviewing defendants' proposed discovery 0.3
10/24/2014	MD	0.5	md reviewing and editing Plaintiffs discovery demands 0.5
10/24/2014	AN	1	update index of client documents
10/24/2014	AG	0.4	research issues in TMs as per CM
10/24/2014	AN	0.2	AN/CM discuss status and next steps of consent to sue reconciliation (.2)
10/24/2014	CM	1.2	run update on reconciliation of pacer with TM client records (1.2)
10/24/2014	CM	0.2	AN/CM discuss status and next steps of consent to sue reconciliation (.2)
10/24/2014	CM	0.3	resolve opt-in records problems (.3)
10/24/2014	AN	0.3	Record team meeting notes from 10-23-14 meeting

Date	Staff	Amount of Time	Description
10/24/2014	AN	0.2	AN/MR Review indexing options for client documents
10/24/2014	MR	0.2	AN/MR Review indexing options for client documents
10/24/2014	MD	0.2	md review defendants' discovery demands 0.2
10/24/2014	CLER	0.3	Verify client information in time matters
10/27/2014	MA	0.2	JLP/KW/MA review formatting options for interrogatory questions
10/27/2014	KW	0.2	JLP/KW/MA review formatting options for interrogatory questions
10/27/2014	JP	0.2	JLP/KW/MA review formatting options for interrogatory questions
10/27/2014			prepare Errata form for deposition transcript review .1 draft deposition transcript review instructions email deposition transcript, errata form. timeframe and instructions to deponent [client]
	KW	0.3	
10/27/2014			prepare Errata form for deposition transcript review .1 draft deposition transcript review instructions email deposition transcript, errata form. timeframe and instructions to deponent [client]
	KW	0.3	
10/27/2014			prepare Errata form for deposition transcript review .1 draft deposition transcript review instructions email deposition transcript, errata form. timeframe and instructions to deponent [client]
	KW	0.3	
10/27/2014	MA	0.2	researching how to re-format questions to ensure efficiency for interrogatory questions
10/27/2014			prepare Errata form for deposition transcript review .1 draft deposition transcript review instructions email deposition transcript, errata form. timeframe and instructions to deponent [client]
	KW	0.3	
10/27/2014	KW	1.1	JP/KW work on creating [ ] questions for plaintiffs to begin process to produce individual discovery responses for all 849 opt-ins
10/27/2014			prepare Errata form for deposition transcript review .1 draft deposition transcript review instructions email deposition transcript, errata form. timeframe and instructions to deponent [client]
	KW	0.3	
10/27/2014	JP	1.1	JP/KW work on creating [ ] questions for plaintiffs to begin process to produce individual discovery responses for all 849 opt-ins
10/28/2014	CLER	0.8	Scan and file Client Deposition Exhibits
10/28/2014			jp/kw review status of developing [ ] tool to use to inform responses to defendant's discovery requests .1 outline tasks to be completed and expertise needed .1
	JP	0.2	
10/28/2014			review exhibits for depositions of [clients] for addition to electronic file .2 explain tasks needed to add exhibits to electronic file or each of the 4 deponents to paralegal handling document scanning and filing .1
	KW	0.3	
10/28/2014			respond to email from deponent regarding change to deposition transcript .1 email questions to attorney .1 update spreadsheet tracking deposition transcript review and responses .1
	KW	0.3	
10/28/2014	CLER	1.6	Verify client information on CTS and in Time Matters
10/28/2014			jp/kw review status of developing [ ] tool to use to inform responses to defendant's discovery requests .1 outline tasks to be completed and expertise needed .1
	KW	0.2	
10/28/2014	KW	0.2	draft and send email to gather information needed to challenge or verify defendant deciding plaintiff [client] was excluded
10/28/2014	KW	0.3	telephone call to verify employment dates at Kellogg and SOL for claims .2 add information to case notes .1
10/28/2014	KW	0.2	draft and send email to gather information needed to challenge or verify defendant deciding plaintiff [client] was excluded
10/28/2014	KW	0.2	draft and send email to gather information needed to challenge or verify defendant deciding plaintiff [client] was excluded

Date	Staff	Amount of Time	Description
10/28/2014	MR	0.5	jp/kw/mr work on creating [ ] test to respond to defendant's discovery demands .5
10/28/2014	JP	0.5	jp/kw/mr work on creating [ ] test to respond to defendant's discovery demands .5
10/28/2014	CLER	0.3	Verify client information on CTS and in TM
10/28/2014	KW	0.5	jp/kw/mr work on creating [ ] test to respond to defendant's discovery demands .5
10/28/2014	KW	0.1	update electronic file of plaintiffs' discovery requests
10/28/2014	AG	0.1	PCF [client] (confirming receipt of CTS, she faxed)
10/28/2014	KW	0.4	telephone call to verify employment dates at Kellogg and SOL for claims .3 add information to case notes .1
10/28/2014	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
10/28/2014	CLER	0.1	Data Entry of contact information of new client
10/28/2014	CLER	0.2	prepare welcome letter to new client
10/28/2014	KW	0.1	draft and send email [client] plaintiff to verify employment dates and titles while employed to challenge or verify Exclusion List
10/28/2014	KW	0.2	draft and send email to gather information needed to challenge or verify defendant deciding plaintiff [client] was excluded
10/28/2014	KW	0.1	draft email to litigation paralegals for this case outlining issues and tasks that need coordination .1
10/28/2014	KW	0.2	draft and send email to gather information needed to challenge or verify defendant deciding plaintiff [client] was excluded
10/28/2014	KW	0.1	draft and send email to plaintiff to verify employment dates and titles while employed to challenge or verify Exclusion List
10/28/2014	JS	0.2	call to confirm fax receipt
10/28/2014	KW	0.2	draft and send email to gather information needed to challenge or verify defendant deciding plaintiff [client] was excluded
10/28/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Tina L. Lee)
10/28/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#284 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Tina L. Lee)(Dunn, Matt)
10/29/2014	DG	0.1	md/dg discussing follow up to Jim on discovery and settlement discussion for RSRs 0.1
10/29/2014	MD	0.1	md/dg discussing follow up to Jim on discovery and settlement discussion for RSRs 0.1
10/29/2014	MD	1.8	dg/md/jp/an/kw Litigation team meeting to develop detailed response to defendant's discovery requests to all plaintiffs; review information provided in Exclusion lists and opt-ins contradictory evidence; plan a process to vet and notice potential deponents; decide how to proceed with possibility of settlement discussions for Morning Foods opt-ins
10/29/2014	JP	1.8	dg/md/jp/an/kw Litigation team meeting to develop detailed response to defendant's discovery requests to all plaintiffs; review information provided in Exclusion lists and opt-ins contradictory evidence; plan a process to vet and notice potential deponents; decide how to proceed with possibility of settlement discussions for Morning Foods opt-ins

Date	Staff	Amount of Time	Description
10/29/2014	AN	1.8	dg/md/jp/an/kw Litigation team meeting to develop detailed response to defendant's discovery requests to all plaintiffs; review information provided in Exclusion lists and opt-ins contradictory evidence; plan a process to vet and notice potential deponents; decide how to proceed with possibility of settlement discussions for Morning Foods opt-ins
10/29/2014	DG	1.8	dg/md/jp/an/kw Litigation team meeting to develop detailed response to defendant's discovery requests to all plaintiffs; review information provided in Exclusion lists and opt-ins contradictory evidence; plan a process to vet and notice potential deponents; decide how to proceed with possibility of settlement discussions for Morning Foods opt-ins
10/29/2014	KW	0.1	jp/kw confer regarding response to plaintiff whose claim is outside FLSA SOL
10/29/2014	KW	0.2	send email to plaintiff [client] explaining SOL in this case
10/29/2014	MD	0.4	md drafting reviewing outstanding discovery and drafting email to defense counsel 0.4
10/29/2014	JP	0.1	jp/kw confer regarding response to plaintiff whose claim is outside FLSA SOL
10/29/2014	KW	0.4	respond to email from plaintiff [client] regarding dates of employment and job titles -.1 add information to case notes .1 determine if plaintiff's inclusion in defendant's Exclusion list is valid .1 update spreadsheet tracking challenges and verifications of defendant's Exclusion List .1
10/29/2014	KW	0.9	research information from plaintiff Intake interview to challenge or verify Defendant's Exclusion List Record information on spreadsheet of Exclusions and PLT information email plaintiffs as needed to gather information about dates of employment or job titles
10/29/2014	KW	0.4	respond to email from plaintiff [client] regarding dates of employment and job titles -.1 add information to case notes .1 determine if plaintiff's inclusion in defendant's Exclusion list is valid .1 update spreadsheet tracking challenges and verifications of defendant's Exclusion List .1
10/29/2014	KW	0.2	email to plaintiff [client] explaining his claims and the SOL in this lawsuit .2
10/29/2014	KW	0.4	respond to email from plaintiff [client] regarding dates of employment and job titles -.1 add information to case notes .1 determine if plaintiff's inclusion in defendant's Exclusion list is valid .1 update spreadsheet tracking challenges and verifications of defendant's Exclusion List .1
10/29/2014	CLER	1.3	Verify client information on CTS and in TM
10/29/2014	KW	0.4	respond to email from plaintiff [client] regarding dates of employment and job titles -.1 add information to case notes .1 determine if plaintiff's inclusion in defendant's Exclusion list is valid .1 update spreadsheet tracking challenges and verifications of defendant's Exclusion List .1
10/29/2014	KW	1.8	dg/md/jp/an/kw Litigation team meeting to develop detailed response to defendant's discovery requests to all plaintiffs; review information provided in Exclusion lists and opt-ins contradictory evidence; plan a process to vet and notice potential deponents; decide how to proceed with possibility of settlement discussions for Morning Foods opt-ins
10/30/2014	MD	0.1	md email defense counsel about edits to discovery requests 0.1
10/30/2014	KW	0.2	check electronic file of information on plaintiff [client] send email to gather information needed to determine response to defendant's Exclusion List
10/30/2014	MD	0.1	dg/md discuss [client]'s response re their interrogatory request .1
10/30/2014	DG	0.1	dg/md discuss [client]'s response re their interrogatory request .1
10/30/2014	KW	0.2	md/kw paralegal meet with attorney to get clarification of impact on potential tolling on analysis of defendant's Exclusion List



Date	Staff	Amount of Time	Description
10/30/2014	KW	0.3	update spreadsheet detailing PLT response to defendant's Exclusion List-add information about tolling back to 3 years prior to date of filing Complaint
10/30/2014	MD	0.1	md call with client about representation in separate case 0.1
10/30/2014	KW	0.4	telephone call to plaintiff [client] to gather information needed to challenge or verify defendant's Exclusion list-.2 add information to case notes .1 add information to spreadsheet of Exclusions
10/30/2014	MD	0.3	MD/KW edit and revise draft of interrogatories for all plaintiffs .3
10/30/2014	KW	0.3	provided case update to plaintiff [client] verified contact information in electronic file added information to case notes
10/30/2014	MD	0.3	md edit discovery request 0.3
10/30/2014	MD	0.2	md/kw paralegal meet with attorney to get clarification of impact on/of potential tolling on analysis of defendant's Exclusion List
10/30/2014	MD	0.3	md call with defense counsel about discovery requests 0.3
10/30/2014	KW	0.3	MD/KW edit and revise draft of interrogatories for all plaintiffs .3
10/30/2014	KW	0.2	respond to plaintiff [client] questions regarding litigation process and progress .2
11/3/2014	CLER	0.1	Data Entry of contact information of client
11/3/2014	CLER	0.2	prepare welcome letter to new client
11/3/2014	KW	0.2	md/kw review issues and determine next steps in moving the process to get responses to defendant's interrogatories .2
11/3/2014	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/3/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Maxwell B. Daugherty)
11/3/2014	KW	0.2	add information from interviews and email responses to spreadsheet tracking plaintiff's responses to Exclusion List Information
11/3/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#285 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Maxwell B. Daugherty)(Dunn, Matt)
11/3/2014	MD	0.2	md/kw review issues and determine next steps in moving the process to get responses to defendant's interrogatories .2
11/3/2014	KW	1.4	jp/kw revise questions tool to provide certification [ ] for each plaintiff who provides information to complete interrogatories draft explanatory email of instructions to go to all plaintiffs -explaining attorney client confidentiality. privilege and possible loss of claims in the event of non-responsiveness
11/3/2014	KW	0.1	email response to plaintiff [client] to gather information to challenge or verify exclusion list .1
11/3/2014	MD	0.5	md editing defendants' discovery demands on plaintiffs and drafting email to defense counsel 0.5
11/3/2014	KW	0.1	email response to plaintiff [client] to gather information to challenge or verify exclusion list .1
11/3/2014	KW	0.1	email response to plaintiff [client] to gather information to challenge or verify exclusion list .1
11/3/2014	KW	0.3	respond to email from plaintiff regarding job titles and employment dates to challenge or verify Defendant's Exclusion List add information to case notes .1 update Exclusion List response tracking spreadsheet .1
11/3/2014	JS	0.1	call for KW--will call again tomorrow, 11/4
11/3/2014	KW	0.4	respond to email from putative class member regarding filing late CTS .2 open case contact .1 update case information .1

Date	Staff	Amount of Time	Description
11/3/2014	KW	0.3	respond to email from plaintiff regarding job titles and employment dates to challenge or verify Defendant's Exclusion List add information to case notes .1 update Exclusion List response tracking spreadsheet .1
11/3/2014	JP	1.4	jp/kw revise [ ] tool to provide certification [ ] for each plaintiff who provides information to complete interrogatories draft explanatory email of instructions to go to all plaintiffs - explaining attorney client confidentiality. privilege and possible loss of claims in the event of non-responsiveness
11/3/2014	KW	0.2	md/kw review information in Kellogg Bates # 73417-to see if information provided addressed our discovery requests for information about Variable Labor hours supervised by TMs in CA
11/3/2014	KW	0.2	draft email to plaintiff [client] to gather information needed to challenge or confirm Kellogg's Exclusion List .1 add information to case notes .1
11/3/2014	KW	0.4	read case notes for plaintiff [client] to determine to challenge or verify Kellogg's Exclusion List .2 email plaintiff to clarify exact dates he worked as a TM and a RSM add information to spreadsheet tracking Exclusion List data
11/3/2014	KW	0.3	received Consent form via email; printed it and relayed to paralegal for filing responded to email from putative class member added information to case notes
11/3/2014	KW	0.2	draft email to plaintiff [client] to gather information needed to challenge or confirm Kellogg's Exclusion List .1 add information to case notes .1
11/3/2014	MD	0.7	md reviewing outstanding discovery and writing defense counsel email regarding outstanding discovery 0.7
11/3/2014	MD	0.2	md/kw review information in Kellogg Bates # 73417-to see if information provided addressed our discovery requests for information about Variable Labor hours supervised by TMs in CA
11/4/2014	KW	0.9	analyze documents produced by defendant to support defendant's Exclusion List to determine facts for each opt-in
11/4/2014	MA	0.3	jp/ma/kw discuss document production , case litigation needs and explore possible staffing patterns to meet the document tracking, proof and litigation needs
11/4/2014	JP	0.3	jp/ma/kw discuss document production , case litigation needs and explore possible staffing patterns to meet the document tracking, proof and litigation needs
11/4/2014	AN	0.5	Meeting regarding Def. Def. opt-in questions
11/4/2014	MD	0.2	md researching dates of availability for [client]'s deposition 0.2
11/4/2014	KW	0.5	research HRIS files --regarding plaintiff [client]-produced by defendant to Exclusion List-analyze information in HRIS files and compare to information provided by plaintiff [client] and to SOL
11/4/2014	AG	0.2	review docket file for missing docket entries
11/4/2014	KW	0.4	analyze data produced by defendant to support Plaintiff [client] being excluded .2 review information received from plaintiff [client] regarding amount of variable labor hours he supervised while working as an RSM .1 add information to Exclusion Tracking spreadsheet .1
11/4/2014	KW	0.3	jp/ma/kw discuss document production , case litigation needs and explore possible staffing patterns to meet the document tracking, proof and litigation needs
11/4/2014	KW	0.2	attempted telephone calls to plaintiff [client] to discuss details of employment at Kellogg to verify or challenge Kellogg Exclusion List .1 email to plaintiff MF -including questions needing a response to determine if he should be on Exclusion List .1

Date	Staff	Amount of Time	Description
11/4/2014	MD	0.5	dg/md/jp/kw Litigation team meeting to review latest version and decide response to defendant's latest version of Discovery requests-focusing on demands for discovery from current employees
11/4/2014	AG	0.2	conduct verification of client health status ([client]
11/4/2014	KW	0.5	dg/md/jp/kw Litigation team meeting to review latest version and decide response to defendant's latest version of Discovery requests-focusing on demands for discovery from current employees
11/4/2014	DG	0.5	edit instructions to clients re interrogatory [ ] process .5
11/4/2014	JS	0.1	call for KW--js put through to vm
11/4/2014	JP	0.5	dg/md/jp/kw Litigation team meeting to review latest version and decide response to defendant's latest version of Discovery requests-focusing on demands for discovery from current employees
11/4/2014	DG	0.5	dg/md/jp/kw Litigation team meeting to review latest version and decide response to defendant's latest version of Discovery requests-focusing on demands for discovery from current employees
11/4/2014	KW	0.3	respond to email from plaintiff regarding her dates of employment and job titles to challenge defendant's Exclusion List .1 add details of employment dates to case notes .1 add information to spreadsheet tracking responses to Exclusion List .1
11/4/2014	MD	0.1	md emailing defense counsel about conferring about discovery requests 0.1
11/4/2014	DG	0.4	draft letter to [client] re Kellogg's agreement not to seek resumes from current employees .4
11/4/2014	MD	0.1	md editing and sending email to defense counsel about discovery 0.1
11/5/2014	KW	0.4	respond to questions from plaintiff [client] regarding how to establish claims, exemptions to overtime pay and half time pay .3 add information to case notes .1
11/5/2014	MD	0.1	md email defense counsel about discussing discovery demands 0.1
11/5/2014	KW	0.3	jp/kw review, analyze and revise document organization and production management spreadsheets to track defendant and plaintiff productions .3
11/5/2014	KW	0.1	jp/kw confer regarding proposed changes to email to all plaintiffs explaining discovery required by court order
11/5/2014	KW	0.2	read and revise draft email to explain court direction to gather data from each plaintiff and explain discovery process .2
11/5/2014	MD	0.2	md email defense counsel about discovery process and deposition 0.2
11/5/2014	JP	0.1	jp/kw confer regarding proposed changes to email to all plaintiffs explaining discovery required by court order
11/5/2014	MD	0.2	md review document production 0.2
11/5/2014	JP	0.3	jp/kw review, analyze and revise document organization and production management spreadsheets to track defendant and plaintiff productions .3
11/5/2014	MA	0.4	AN/JLP/MA meet to revise document/discovery tracking spreadsheet to ensure efficiency for litigation team
11/5/2014	JP	0.4	AN/JLP/MA meet to revise document/discovery tracking spreadsheet to ensure efficiency for litigation team
11/5/2014	AN	0.4	AN/JLP/MA meet to revise document/discovery tracking spreadsheet to ensure efficiency for litigation team
11/5/2014	KW	0.4	fact finding interview to gather information to challenge or verify defendant's exclusion list .3 add information to case notes .1
11/6/2014	AN	0.3	JLP/AN Review Master Proof spreadsheet

Date	Staff	Amount of Time	Description
11/6/2014	AN	1.9	AN/KW Complete a thorough review of all documents produced by defendant, verifying Bates Numbers; identifying duplicate Bates Numbers, verifying Bates Index and date and method of production
11/6/2014	KW	1.9	AN/KW Complete a thorough review of all documents produced by defendant, verifying Bates Numbers; identifying duplicate Bates Numbers, verifying Bates Index and date and method of production
11/6/2014	AN	0.3	Review sample questions of Def. discovery questions
11/6/2014	MD	0.1	MD/KW determine next steps in testing process of [ ] complete[ing] Interrogatories .1
11/6/2014	JP	0.4	jp/kw review, revise and re-format [ ] questions needed to collect discovery required from all plaintiffs .4
11/6/2014	KW	0.1	MD/KW determine next steps in testing process [ ] to complete Interrogatories .1
11/6/2014	KW	0.4	jp/kw review, revise and re-format [ ] questions needed to collect discovery required from all plaintiffs .4
11/6/2014	MD	0.2	md call with defense counsel about discovery requests 0.2
11/6/2014	MD	0.3	md/jp/kw confer regarding latest response from defendants' counsel regarding Interrogatory's final form .1 discuss any explanations of terms needed [ ] and format for various questions .2
11/6/2014	JP	0.3	md/jp/kw confer regarding latest response from defendants' counsel regarding Interrogatory's final form .1 discuss any explanations of terms needed [ ] and format for various questions .2
11/6/2014	KW	0.4	fact finding interview to gather information to challenge Defendant's Exclusion List .3
11/6/2014	AN	0.3	add information to case notes
11/6/2014	AN	0.3	Index def. documents and review master spreadsheet
11/6/2014	JP	0.3	JLP/AN Review Master Proof spreadsheet
11/6/2014	KW	0.3	md/jp/kw confer regarding latest response from defendants' counsel regarding Interrogatory's final form .1 discuss any explanations of terms [ ] and format for various questions .2
11/6/2014	MD	1	md reviewing/editing Kellogg's discovery demands and preparing for dissemination to clients 1.0
11/7/2014	CM	0.4	review draft client discovery questions (.4)
11/7/2014	AN	0.2	Review email letter to accompany [ ] def. questions
11/7/2014	MA	0.3	reviewing/editing interrogatory
11/7/2014	CM	0.3	JP/CM edit interrogatory (.3)
11/7/2014	JP	0.3	JP/CM edit interrogatory (.3)
11/7/2014	AG	0.5	review linked interrogatory for feedback (rogs questionnaire)
11/9/2014	MR	1.2	work on script to correct hyperlink address for documents index
11/10/2014	KW	0.1	MD/KW discussion of format [ ] to secure the highest rate of responses .1
11/10/2014	MA	0.2	creating alternate version of discovery questionnaire
11/10/2014	KW	0.4	JP/KW review Explanation of Need for Discovery, explanation of discovery process we are beginning and instructions to plaintiffs for completing interrogatories and document production discuss issues and determine most effective way to explain discovery needs to plaintiffs revise introductory email
11/10/2014	MD	0.2	md reviewing and editing email to clients about Kellogg's discovery requests 0.2
11/10/2014	MD	0.1	MD/KW discussion of format of questionnaire- to secure the highest rate of responses .1

Date	Staff	Amount of Time	Description
11/10/2014	MA	0.1	KW/MA meet to discuss creating multi-page draft version of discovery rep questions
11/10/2014	MA	0.1	MA/KW/JLP review how to redirect opt-ins to Getman Sweeney website following completion of interrogatory questions
11/10/2014	KW	0.3	review information provided by defendant on Exclusion List- Research consent to sue signed by plaintiff draft email to plaintiff [client] to gather information needed to challenge or verify Exclusion List
11/10/2014	MA	0.2	JLP/KW/MA meet to discuss options for discovery rep questions to ensure efficiency for opt-ins
11/10/2014	KW	0.1	KW/MA meet to discuss creating multi-page draft version of discovery rep questionnaire
11/10/2014	JP	0.2	JLP/KW/MA meet to discuss options for discovery rep questionnaire to ensure efficiency for opt-ins
11/10/2014	KW	0.2	JLP/KW/MA meet to discuss options for discovery rep questionnaire to ensure efficiency for opt-ins
11/10/2014	KW	0.1	MA/KW/JLP review how to redirect opt-ins to Getman Sweeney website following completion of interrogatory questionnaire
11/10/2014	JP	0.1	MA/KW/JLP review how to redirect opt-ins to Getman Sweeney website following completion of interrogatory questionnaire
11/10/2014	JP	0.4	JP/KW review Explanation of Need for Discovery, explanation of discovery process we are beginning and instructions to plaintiffs for completing questionnaire and document production discuss issues and determine most effective way to explain discovery needs to plaintiffs revise introductory email
11/10/2014	CLER	0.1	Create PDF format of documents recd from Aktinson Baker ( CC letter to D., re M. [client] Transcripts)
11/10/2014	KW	0.4	Use information provided by plaintiff [client] to challenge Exclusion List of defendant: update Exclusion Spreadsheet add information regarding employment to case notes respond to email from plaintiff
11/10/2014	CLER	0.1	Create PDF format of documents recd from Aktinson Baker ( CC letter to D., re [client] Transcripts)
11/10/2014	KW	0.5	[ ] to find and fix glitches in questionnaire format, wording and flow .4 report to lead paralegal re changes needed .1
11/10/2014	KW	0.4	search through HRIS files produced by defendant to find information to inform challenging or verifying Exclusion List add relevant information to tracking spreadsheet
11/10/2014	KW	0.3	review status of deposition transcript review for deponent [client] draft and send email to plaintiff to follow-up on review and move the review process along update deposition tracking spreadsheet
11/10/2014	KW	0.2	review intake notes to confirm valid participation in this lawsuit .1 update spreadsheet re challenging or verifying defendant's Exclusion List .1
11/10/2014	KW	0.2	telephone calls to Court reporter services to determine who completed transcript for deposition of [client] .2
11/10/2014	KW	0.2	jp/kw review status of plaintiff discovery process .1 determine tasks to be completed today .1
11/10/2014	KW	0.3	review status of deposition transcript review for deponent [client] draft and send email to plaintiff to follow-up on review and move the review process along update deposition tracking spreadsheet
11/10/2014	JP	0.2	jp/kw review status of plaintiff discovery process .1 determine tasks to be completed today .1

Date	Staff	Amount of Time	Description
11/10/2014	KW	0.3	review status of deposition transcript review fro deponent [client] draft and send email to plaintiff to follow-up on review and move the review process along update deposition tracking spreadsheet
11/10/2014	KW	0.3	review status of deposition transcript review fro deponent [client] draft and send email to plaintiff to follow-up on review and move the review process along update deposition tracking spreadsheet
11/10/2014	KW	0.3	draft email to secure information needed to challenge or verify plaintiff [client] being on defendant's Exclusion List .2 record attempted contact in case notes .1
11/10/2014	DG	0.5	review [ ] interrogatory answer tool .3; prepare email to litigation team re how to handle gathering documents from [ ] responses .2
11/12/2014	AN	0.1	File def. ROG documents
11/12/2014	JP	0.5	JP/KW update questions to gather information to respond to discovery demands of defendant .3 draft outline of process to be presented and approved at litigation team meeting this afternoon .2
11/12/2014	KW	0.5	JP/KW update questions to gather information to respond to discovery demands of defendant .3 draft outline of process to be presented and approved at litigation team meeting this afternoon .2
11/12/2014	KW	0.6	fact finding interview with plaintiff [client] to gather information to challenge or verify Def. Exclusion List .6
11/12/2014	KW	0.2	DG/JP/KW identify issues needing resolution in status of discovery response process .2
11/12/2014	JP	0.2	DG/JP/KW identify issues needing resolution in status of discovery response process .2
11/12/2014	DG	0.4	DG/JP/KW identify issues needing resolution in status of discovery response process .2; edit Kellogg letter to [client] re rolling response from Pls to interros .2
11/12/2014	MD	0.2	md call with client about deposition 0.2
11/12/2014	MD	0.2	md drafting response to defense counsel 0.2
11/13/2014	KW	2.2	DG/MD/JP/MR/AN/KW litigation team meeting to finalize email explanation and instructions to plaintiffs regarding court ordered discovery process; finalize wording of [ ] questions discuss and finalize process to gather information required, for [ ] individual interrogatory responses and secure signature from 849 individual plaintiffs
11/13/2014	AN	0.1	KW/AN Discuss designation of client as deceased
11/13/2014	KW	0.2	JP/KW Attempt to resolve logic issues in final [ ] questions .2
11/13/2014	JP	2.2	DG/MD/JP/MR/AN/KW litigation team meeting to finalize email explanation and instructions to plaintiffs regarding court ordered discovery process; finalize wording of [ ] questions discuss and finalize process to gather information required, for [ ] individual interrogatory responses and secure signature from 849 individual plaintiffs
11/13/2014	MR	2.2	DG/MD/JP/MR/AN/KW litigation team meeting to finalize email explanation and instructions to plaintiffs regarding court ordered discovery process; finalize wording of [ ] questions discuss and finalize process to gather information required, for [ ] individual interrogatory responses and secure signature from 849 individual plaintiffs



Date	Staff	Amount of Time	Description
11/13/2014	DG	2.2	DG/MD/JP/MR/AN/KW litigation team meeting to finalize email explanation and instructions to plaintiffs regarding court ordered discovery process; finalize wording of [ ] questions discuss and finalize process to gather information required, for [ ] individual interrogatory responses and secure signature from 849 individual plaintiffs
11/13/2014	AN	2.2	DG/MD/JP/MR/AN/KW litigation team meeting to finalize email explanation and instructions to plaintiffs regarding court ordered discovery process; finalize wording of [ ] questions discuss and finalize process to gather information required, for [ ] individual interrogatory responses and secure signature from 849 individual plaintiffs
11/13/2014	MD	2.2	DG/MD/JP/MR/AN/KW litigation team meeting to finalize email explanation and instructions to plaintiffs regarding court ordered discovery process; finalize wording of [ ] questions discuss and finalize process to gather information required, for [ ] individual interrogatory responses and secure signature from 849 individual plaintiffs
11/13/2014	MD	0.3	md reviewing defendants' discovery demands 0.3
11/13/2014	KW	0.2	JP/KW confer about discovery process time frame and information to be presented at litigation team meeting
11/13/2014	JP	0.2	JP/KW Attempt to resolve logic issues in final questions .2
11/13/2014	KW	0.1	KW/AN Discuss designation of client as deceased
11/13/2014	JP	0.4	JP/AN/KW Complete production of [ ] questions for test run .4
11/13/2014	AN	0.4	JP/AN/KW Complete production of [ ] questions for test run .4
11/13/2014	JP	0.1	dg/jp discuss issues related to crafting client interrogatory answering process .1
11/13/2014	DG	0.1	dg/jp discuss issues related to crafting client interrogatory answering process .1
11/13/2014	JP	0.2	JP/KW confer about discovery process time frame and information to be presented at litigation team meeting
11/13/2014	KW	0.4	JP/AN/KW Complete production of [ ] questions for test run .4
11/13/2014	KW	0.3	telephone call from plaintiff [client]- current Kellogg employee that she is being required to work 15 hours today and 15 hours tomorrow-.2 add information to case notes .1
11/13/2014	AN	0.2	Index Client Documents for [client]
11/13/2014	KW	0.2	read through report from plaintiff [client] regarding overtime payments allegedly made to Kellogg personnel in Billing MT respond to email with follow-up questions
11/13/2014	MD	0.2	md research recent outside sales exemption decision 0.2
11/13/2014	KW	0.1	MD/KW confer regarding information received from plaintiff [client]-determine follow-up information needed .1
11/13/2014	MD	0.1	MD/KW confer regarding information received from plaintiff [client]-determine follow-up information needed .1
11/13/2014	KW	0.4	review email and spreadsheet sent by plaintiff [client] regarding her supervisor emailing that she had to work 15 hours today and tomorrow .2 telephone call to plaintiff [client] to discuss spreadsheet data and email .2
11/14/2014	CLER	0.1	PCF client ([client] providing email address and confirming contact information)
11/14/2014	AN	0.5	Review and answer[ ] questions for Def. Interrogatory Questions
11/14/2014	CM	0.2	revise questions (.2)
11/14/2014	JP	2.3	call to all plaintiffs who have no email address to get email address to send Answer to Interrogatories [ ]

Date	Staff	Amount of Time	Description
11/14/2014	MD	0.02	md researching activities performed at zone rallies 0.2
11/14/2014	DG	0.1	check change in discovery doc demand by def .1
11/14/2014	MD	0.5	md drafting objections/form to Kellogg's discovery requests 0.5
11/14/2014	JS	0.2	review questions and email, and provide feedback on both
11/14/2014	MD	0.2	md/jp discussing preparing discovery responses to Kellogg's requests 0.2
11/14/2014	MD	0.6	dg/jp/md discuss edits to client questions tool to answer interrogs .6
11/14/2014	JP	0.2	md/jp discussing preparing discovery responses to Kellogg's requests 0.2
11/14/2014	CLER	0.1	PCF client ([client] providing email address and confirming contact information)
11/14/2014	JP	0.6	dg/jp/md discuss edits to client [ ] tool to answer interrogs .6
11/14/2014	AG	0.2	take questions and for feedback on ease of use
11/14/2014	JP	0.1	JLP/MA review revisions to Kellogg questions to ensure usability for opt-ins
11/14/2014	DG	0.2	dg/jp discuss edits to client [ ] tool to answer interrogs .2
11/14/2014	JP	0.2	dg/jp discuss edits to client [ ] tool to answer interrogs .2
11/14/2014	MA	0.3	JLP/AN/MA meet to finalize formatting of Kellogg interrogatories
11/14/2014	AN	0.3	JLP/AN/MA meet to finalize formatting of Kellogg interrogatories
11/14/2014	JP	0.3	JLP/AN/MA meet to finalize formatting of Kellogg interrogatories
11/14/2014	DG	0.6	dg/jp/md discuss edits to client [ ] tool to answer interrogs .6
11/14/2014	MA	0.1	reviewing Kellogg interrogatories to ensure clarity
11/14/2014	JP	1.3	JLP/AN Revise [ ] questions for Def. Interrogatories
11/14/2014	MA	0.1	JLP/MA review revisions to Kellogg questions to ensure usability for opt-ins
11/14/2014	AN	1.3	JLP/AN Revise [ ] questions for Def. Interrogatories
11/14/2014	DG	0.3	answer questions to see if any problems .2; identify problems with instructions in writing to litigation group .1
11/14/2014	CM	0.1	call to opt-in re whether can do interrogatories by email (.1)
11/14/2014	CLER	1.7	Verify client information from CTS form matches TM
11/17/2014	JP	0.2	MD/JP/KW confer regarding wording of questions questions regarding definition of sales and how to explain to plaintiffs taking the questions-to respond to defendant's discovery demands .2
11/17/2014	MR	0.1	MD/MR discuss need for test template .1
11/17/2014	KW	0.2	MD/KW discuss changes needed in questions and Interrogatory Objections and Answers to comply with producing discovery responses for 849 plaintiffs .2
11/17/2014	MD	0.2	MD/JP/KW confer regarding wording of questions questions regarding definition of sales and how to explain to plaintiffs taking the questions-to respond to defendant's discovery demands .2
11/17/2014	KW	0.3	draft email to plaintiff [client] explaining need to review deposition and review process .2
11/17/2014	MD	0.1	send email and save to electronic file
11/17/2014	KW	0.2	MD/MR discuss need for test template .1
11/17/2014	KW	0.2	add pdf and ptx of deposition transcript to electronic file .1 add exhibits to electronic file .1
11/17/2014	JP	0.4	jp/kw organize and re-number discovery folders in electronic file for clarity and efficient access by litigation team .4
11/17/2014	KW	0.2	MD/JP/KW confer regarding wording of questions questions regarding definition of sales and how to explain to plaintiffs [ ]-to respond to defendant's discovery demands .2
11/17/2014	KW	0.2	add email address to electronic contact information file.1 email information to lead paralegal .1
11/17/2014	MR	2.8	organize test output from questions, test document Merge with SM data 1.8
11/17/2014	MD	0.2	MD/KW discuss changes needed in questions and Interrogatory Objections and Answers to comply with producing discovery responses for 849 plaintiffs .2

Date	Staff	Amount of Time	Description
11/17/2014	MR	0.3	examine email from MD with test template .1, examine email from JP with text excel output and test template .2
11/17/2014	MD	1	md edit questions for plaintiffs to answer Kellogg's discovery requests 1.0
11/17/2014	MD	0.5	md review Kellogg list of potential deponents 0.5
11/17/2014	MD	0.1	md/mr discuss review and formatting needs in order to respond to Kellogg's discovery requests 0.1
11/17/2014			jp/kw work on format and wording of questions to incorporate latest changes to produce information required by defendant's discovery requests .3 produce 2 practice questions .1 download results of practice questions to excel spreadsheet for production to interrogatories .1 review results .1
11/17/2014	KW	0.6	
11/17/2014	KW	0.1	md/kw discuss plaintiff [client]'s deposition transcript review and Errata sheet .1
11/17/2014	MD	0.1	md/kw discuss plaintiff [client]'s deposition transcript review and Errata sheet .1
11/17/2014	KW	0.4	prepare Errata Sheet for plaintiff [client] .2 email with instructions to plaintiff [client] .1 add information to case notes
11/17/2014	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker (Ltr to D. regarding [client] deposition transcripts)
11/17/2014	MD	0.1	md reviewing and proposing edits to deposition transcript based on client feedback 0.1
11/17/2014			jp/kw work on format and wording of questions to incorporate latest changes to produce information required by defendant's discovery requests .3 produce 2 practice question sets .1 download results of practice question sets to excel spreadsheet for production to interrogatories .1 review results .1
11/17/2014	JP	0.6	
11/17/2014	KW	0.1	email to plaintiff [client] regarding updating contact information
11/17/2014			MR/JP/KW in-depth review and analysis of latest document organization and management system explore application to client and defendant indexes identify needs to integrate to proof chart identify problems to be resolved for efficient use
11/17/2014	KW	1.7	
11/17/2014			MR/JP/KW in-depth review and analysis of latest document organization and management system explore application to client and defendant indexes identify needs to integrate to proof chart identify problems to be resolved for efficient use
11/17/2014	MR	1.7	
11/17/2014			MR/JP/KW in-depth review and analysis of latest document organization and management system explore application to client and defendant indexes identify needs to integrate to proof chart identify problems to be resolved for efficient use
11/17/2014	JP	1.7	
11/17/2014	KW	0.4	jp/kw organize and re-number discovery folders in electronic file for clarity and efficient access by litigation team .4
11/18/2014	AN	0.2	KW/AN discuss updated [ ] questions and Kellogg case folders
11/18/2014	KW	0.2	KW/AN discuss updated [ ] questions and Kellogg case folders
11/18/2014	CLER	0.5	Verify client information on CTS with Time Matters data
11/18/2014	AN	0.2	Review updates to questions and mail Merge
11/18/2014	MD	0.2	md writing email to defense counsel about outstanding documents 0.2
11/18/2014	MD	1	md review Kellogg's discovery production to address call with Account Executive 1.0
11/18/2014	KW	0.5	initial intake with putative class member to respond questions and concerns re work job duties and hours worked .3 add information to case notes .2

Date	Staff	Amount of Time	Description
11/18/2014	JP	0.6	jp/kw review [ ] interrogatory form to respond to defendant's interrogatories to determine success of the process and applicability to responses for 849 plaintiffs determine and list issues to be resolved prior to emailing questions to all plaintiffs draft website update to notify class of court order and to expect questions via email or mail
11/18/2014	JP	0.9	JP/KW review and finalize wording of email which will explain discovery process and questions .4 review and finalize format and wording of questions to collect discovery from 849 plaintiffs .4 finalize update to website .1
11/18/2014	KW	0.9	JP/KW review and finalize wording of email which will explain discovery process and questions .4 review and finalize format and wording of questions to collect discovery from 849 plaintiffs .4 finalize update to website .1
11/18/2014	KW	1	DG/MD/JLP/KW/AN/MR review template for questionnaire responses for Def. Opt-in Class discovery
11/18/2014	MR	1	DG/MD/JLP/KW/AN/MR review template for questionnaire responses for Def. Opt-in Class discovery
11/18/2014	MD	1	DG/MD/JLP/KW/AN/MR review template for questionnaire responses for Def. Opt-in Class discovery
11/18/2014	JP	1	DG/MD/JLP/KW/AN/MR review template for questionnaire responses for Def. Opt-in Class discovery
11/18/2014	DG	1	DG/MD/JLP/KW/AN/MR review template for questionnaire responses for Def. Opt-in Class discovery
11/18/2014	KW	0.6	jp/kw review results of test Merge of questions data into interrogatory form to respond to defendant's interrogatories to determine success of the process and applicability to responses for 849 plaintiffs determine and list issues to be resolved prior to emailing questions to all plaintiffs draft website update to notify class of court order and to expect questions via email or mail
11/18/2014	KW	0.8	JLP/KW/AN /MR review template and spreadsheet for questions and responses for Def. Opt-in Class discovery
11/18/2014	JP	0.8	JLP/KW/AN /MR review template and spreadsheet for questions and responses for Def. Opt-in Class discovery
11/18/2014	MR	0.8	JLP/KW/AN /MR review template and spreadsheet for questions and responses for Def. Opt-in Class discovery
11/18/2014	AN	0.8	JLP/KW/AN /MR review template and spreadsheet for questions and responses for Def. Opt-in Class discovery
11/18/2014	MR	0.6	research and test solution for excel mail Merge truncation issue .3, test solution for bold font for responses and reg font otherwise .3
11/18/2014	KW	0.2	respond to email from court reporter service regarding Errata response of deponent [client]
11/18/2014	AN	1	DG/MD/JLP/KW/AN/MR review template for [ ] responses for Def. Opt-in Class discovery
11/19/2014	KW	0.4	use Abby Fine reader software to convert pdf of questions to Word doc form to use to mail to plaintiffs who do not have email .4
11/19/2014	KW	0.4	organize information gleaned from interview with former Account Exec at Kellogg distribute notes to litigation team
11/19/2014	KW	0.3	MR/JP/KW work on best way to transfer questions from on line to Word document for mailing to plaintiffs .3
11/19/2014	CLER	0.2	prepare welcome ltr to new client
11/19/2014	CLER	0.1	Data Entry of contact information of client
11/19/2014	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing

Date	Staff	Amount of Time	Description
11/19/2014	DG	0.4	dg/jp discuss website posting necessary for interrogatory preparation .2; edit website posting .2
11/19/2014	AN	0.1	JLP/AN Discuss client designation in Time Matters for deceased plaintiffs
11/19/2014	JP	0.2	dg/jp discuss website posting necessary for interrogatory preparation .2
11/19/2014	JP	0.1	JLP/AN Discuss client designation in Time Matters for deceased plaintiffs
11/19/2014	MR	0.6	edit doc version of Kellogg questions for mailing
11/19/2014	KW	0.4	organize information gleaned from interview with former Account Exec at Kellogg distribute notes to litigation team
11/19/2014	JP	0.3	md/jp discuss question responses to respond to interrogatories/Kellogg's discovery demands 0.3
11/19/2014	MD	0.2	md edit objections to Kellogg's discovery requests 0.2
11/19/2014	MA	0.2	update website
11/19/2014	MD	0.1	md call with defense counsel about settlement 0.1
11/19/2014	JP	0.8	jp/kw final revision of questions to go out today to 849 plaintiffs .5 final review and revision of explanatory email .2 final review and revision of webpage update .1
11/19/2014	KW	1.6	dg/md/jp/kw fact finding interview with former Kellogg Account Executive for litigation team to gather in depth information regarding corporation sales process from national account level through RSR/TM position
11/19/2014	KW	0.1	ma/kw plan updating Kellogg page on office website to provide current information to class
11/19/2014	KW	0.8	jp/kw final revision of questions to go out today to 849 plaintiffs .5 final review and revision of explanatory email .2 final review and revision of webpage update .1
11/19/2014	MA	0.1	ma/kw plan updating Kellogg page on office website to provide current information to class
11/19/2014	MD	0.3	md/jp discussing questionnaire results to respond to interrogatories/Kellogg's discovery demands 0.3
11/19/2014	MA	0.1	call from opt-in [client] re: interrogatories
11/19/2014	KW	0.3	md/kw identify titles for contracts which defendant has refused to produce; identify timeline for sending out questions; articulate core of primary job duty of plaintiffs
11/19/2014	JS	0.1	plt [client] called for JP or MD; has questions about how to answer questions
11/19/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Rhonda Spencer)
11/19/2014	MD	0.1	md email team about settlement conversation with defense counsel 0.1
11/19/2014	KW	0.6	dg/md/jp/an/kw litigation team meeting to process information obtained from fact finding interview of former Account Exec. Identify documents needed, requested but not produced by defendant; determine next steps regarding noticing Account Executives and Account Managers for depositions
11/19/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#286 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Rhonda Spencer)(Dunn, Matt)
11/19/2014	DG	1.6	dg/md/jp/kw fact finding interview with former Kellogg Account Executive for litigation team to gather in depth information regarding corporation sales process from national account level through RSR/TM position
11/19/2014	MD	1.6	dg/md/jp/kw fact finding interview with former Kellogg Account Executive for litigation team to gather in depth information regarding corporation sales process from national account level through RSR/TM position

Date	Staff	Amount of Time	Description
11/19/2014	JP	1.6	dg/md/jp/kw fact finding interview with former Kellogg Account Executive for litigation team to gather in depth information regarding corporation sales process from national account level through RSR/TM position
11/19/2014	KW	0.7	prepare Merge mail to mail cover letter and questions to those plaintiffs who do not have email .4 prepare cover letter of instructions .2 convert pdf of questions to Word doc for revision and editing .1
11/19/2014	MD	0.3	md/kw identify titles for contracts which defendant has refused to produce; identify timeline for sending out questions; articulate core of primary job duty of plaintiffs
11/19/2014	DG	0.6	dg/md/jp/an/kw litigation team meeting to process information obtained from fact finding interview of former Account Exec. Identify documents needed, requested but not produced by defendant; determine next steps regarding noticing Account Executives and Account Managers for depositions
11/19/2014	JP	0.6	dg/md/jp/an/kw litigation team meeting to process information obtained from fact finding interview of former Account Exec. Identify documents needed, requested but not produced by defendant; determine next steps regarding noticing Account Executives and Account Managers for depositions
11/19/2014	CLER	2	Verify client information on CTS forms with Time Matters
11/19/2014	AN	0.6	dg/md/jp/an/kw litigation team meeting to process information obtained from fact finding interview of former Account Exec. Identify documents needed, requested but not produced by defendant; determine next steps regarding noticing Account Executives and Account Managers for depositions
11/19/2014	MD	0.6	dg/md/jp/an/kw litigation team meeting to process information obtained from fact finding interview of former Account Exec. Identify documents needed, requested but not produced by defendant; determine next steps regarding noticing Account Executives and Account Managers for depositions
11/20/2014	MR	0.1	read and reply to atty DG email about locations of draft template response to discovery
11/20/2014	MD	0.1	dg/md locate objection form that was moved .1
11/20/2014	DG	0.8	dg/md locate objection form that was moved .1; edit objections to interrogatories .7
11/20/2014	MR	0.2	read and reply to atty MD about way to identify Morning Foods RSR in class list and payroll
11/20/2014	KW	0.2	respond to questions from putative class member regarding case claims and timeframe of litigation .2
11/20/2014	KW	0.1	KW/MA review call with opt-in [client] so KW can call him back
11/20/2014	MA	0.1	KW/MA review call with opt-in [client] so KW can call him back
11/20/2014	KW	0.3	email pdf of deposition notice to plaintiff [client] with cover email regarding deposition preparation calls .1 update electronic file of deposition notices .1 add information to case notes .1
11/20/2014	MR	0.3	read and reply to atty MD about damage calcs and need for payroll data .1; examine Def document BSN 48093 .2
11/20/2014	MD	0.1	MD/KW finalize arrangements for deposition of plaintiff [client] in St. Louis on 12/9/14
11/20/2014	KW	0.1	MD/KW finalize system to produce and track production of plaintiffs documents in response to defendant's interrogatories
11/20/2014	CLER	2	Verify client information on CTS forms with TM data
11/20/2014	JS	0.1	call from plt [client] providing email address; added to TM contact



Date	Staff	Amount of Time	Description
11/20/2014	KW	0.4	respond to questions from plaintiff [client] regarding producing documents in response to class wide discovery request of defendant .2 add information to case notes .1 email alert to litigation team regarding checking for documents of plaintiffs who have been deposed or who have already produced documents .1
11/20/2014	MD	0.1	MD/KW finalize system to produce and track production of plaintiffs documents in response to defendant's interrogatories
11/20/2014	KW	0.1	MD/KW finalize arrangements for deposition of plaintiff [client] in St. Louis on 12/9/14
11/20/2014	KW	0.6	Re-read email from plaintiff [client] to determine additional sources of fact information about possible overtime pay for TMs in Montana .1 research contact information for fact witnesses .4 email to plaintiff requesting additional information .1
11/20/2014	KW	1.7	JP/KW plan and create process and spreadsheets to process and track questions responses, Answer to Interrogatories and document production to defendant 1.7
11/20/2014	JP	0.3	called with questions about the questions, and about the case progress
11/20/2014	KW	0.3	respond to plaintiff's concerns regarding his lack of documents and demands by defendant .3
11/20/2014	JP	1.7	JP/KW plan and create process and spreadsheets to process and track questions responses, Answer to Interrogatories and document production to defendant 1.7
11/20/2014	JS	0.3	call from plt [client] re: questions
11/21/2014	MR	0.5	JP/MR discuss steps and edits needed to convert question results to Answer to Interrogatories .3, discuss changes needed to word doc version of questions .2
11/21/2014	JP	2.1	respond to email requests for information about the case and the interrogatories
11/21/2014	MR	0.7	edit script to process Excel results of questions .5, notate other manual changes needed to Excel results before merging data into Answer .2
11/21/2014	JP	0.5	JP/MR discuss steps and edits needed to convert question results to Answer to Interrogatories .3, discuss changes needed to word doc version of questions .2
11/21/2014	MR	0.3	address problems with editing word document version of Kellogg client questions
11/21/2014	CLER	1	Verify client contact information on CTS forms with data in Time Matters
11/21/2014	MR	0.1	read and reply to email from para JP about plaintiff with emails to send to us
11/21/2014	MA	0.1	call from putative class member re: joining
11/21/2014	JP	3.1	create final questionnaire of Answer to Interrogatories to mail to people with no email 2.8; rewrite cover letter .3
11/21/2014	JP	1.7	send letter and questions to all people who have no emails
11/22/2014	MR	0.3	read email from para JP about plaintiff who has many emails .1, call plaintiff to discuss approach to obtain emails .2
11/24/2014	MD	1	md review documents to designate people for deposition 1.0
11/24/2014	KW	0.2	listen to voice message from plaintiff [client] describing documents he has found -hour keying guide from defendant to employees .1 add information to case notes .1
11/24/2014	MD	2	md prepare client for deposition 2.0

Date	Staff	Amount of Time	Description
11/24/2014	KW	0.5	MD/KW review spreadsheet tracking responses to deposition transcript review .1 determine follow-up needed with [client] and [client] regarding transcript Errata sheets .1 determine work needed to prepare for deposition of [client] .1 finalize format of Answer to Interrogatories to prepare for production to defendant .1 determine process for producing resume and job application for named plaintiff [client] .1
11/24/2014	MD	0.8	MD/JP/KW strategy session regarding what positions, national and regional -and how to identify individual to notice for deposition and when -- national and regional- determine and designate tasks to notice depositions plan agenda for litigation team meeting schedule meeting for tomorrow
11/24/2014	JP	0.8	MD/JP/KW strategy session regarding what positions, national and regional -and how to identify individual to notice for deposition and when -- national and regional- determine and designate tasks to notice depositions plan agenda for litigation team meeting schedule meeting for tomorrow
11/24/2014	CLER	0.1	create PDF format of document recd from D. (Notice of Deposition of [client])
11/24/2014	KW	0.8	MD/JP/KW strategy session regarding what positions, national and regional -and how to identify individual to notice for deposition and when -- national and regional- determine and designate tasks to notice depositions plan agenda for litigation team meeting schedule meeting for tomorrow
11/24/2014	KW	0.2	dg/kw/jp discuss situation where MT class of TMs was paid overtime .2
11/24/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#287 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of Robin Walsh)(Dunn, Matt)
11/24/2014	JP	0.2	dg/kw/jp discuss situation where MT class of TMs was paid overtime .2
11/24/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of Robin Walsh)
11/24/2014	KW	0.3	fact finding interview with plaintiff [client] regarding his understanding of details of TM payment for overtime in Billing MT.3
11/24/2014	JP	0.7	JP/KW paralegal meeting to review responses to [ ] questions; determine how to deal with incomplete questions responses; and determine next steps in facilitating a smooth flow of accurate information to inform Answer to Interrogatories for all plaintiffs
11/24/2014	DG	0.3	dg/kw/jp discuss situation where MT class of TMs was paid overtime .2; review facts from intake re same .1
11/24/2014	KW	0.3	print completed consent to sue form .1 add information to case contact notes .1 respond to email regarding filing consent form .1
11/24/2014	MD	0.5	MD/KW review spreadsheet tracking responses to deposition transcript review .1 determine follow-up needed with J Feher and D Mastenbrook regarding transcript Errata sheets .1 determine work needed to prepare for deposition of [client] .1 finalize format of Answer to Interrogatories to prepare for production to defendant .1 determine process for producing resume and job application for named plaintiff [client] .1
11/24/2014	MD	0.2	md drafting email to defense counsel about contract documents 0.2
11/24/2014	MD	0.2	md reviewing documents in preparation for clients deposition prep 0.2
11/24/2014	KW	0.7	JP/KW paralegal meeting to review responses to [ ] questions; determine how to deal with incomplete questions responses; and determine next steps in facilitating a smooth flow of accurate information to inform Answer to Interrogatories for all plaintiffs
11/24/2014	MR	0.1	md/mr discussing prior to responding to interrogatory requests and calculating damages for RSRs in morning foods 0.1

Date	Staff	Amount of Time	Description
11/24/2014	MR	3.3	extract data on possible Morning Food RSR workers from BSN 33427 and 48093 1.0, pull most recent Time Matters client list .3, enter Time Matters contact codes for five clients .2, redo pull of Time Matters client list to include middle initial and some other fields .3, locate and identify most recent class list from Def .2, setup spreadsheet for name match TM list with class list from Def .4, perform some of the initial match-up work .9
11/24/2014	KW	1.2	fact finding interview with witness regarding payment policy changes in Billings MT .8 organize information to draft memo to litigation team .4
11/24/2014	CLER	0.2	prepare welcome ltr to new client
11/24/2014	CLER	0.1	Data Entry of contact information of client
11/24/2014	MD	0.1	md/mr discussing prior to responding to interrogatory requests and calculating damages for RSRs in morning foods 0.1
11/24/2014	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
11/25/2014	MR	0.8	follow-up work on excel questions results to improve usability .3, check on length of fields for open-ended questions answers .5
11/25/2014	MD	0.2	md prepare for meeting on case 0.2
11/25/2014	JS	0.1	call from plt DM re: W-2 forms and faxing
11/25/2014	KW	0.3	draft email to named plaintiff [client] re information needed to complete ERRATA sheet for his signature .2 add information to case notes .1
11/25/2014	KW	0.2	jp/kw discussion of details of primary job duty of TMs in Billings who received OT payments discussion of interrogatories and document requests to defendant regarding lawsuits and DOL investigations
11/25/2014	AN	1.8	DG/MD/JP/MR/AN/KW litigation team meeting to explore and determine depositions to notice- specific individual Account Managers, Zone Managers, Productivity Managers, 30(b)(6) general Notice and 30(b)(6) for Wal-Mart and time studies; determine work needed and timeframe to respond to defendant's request for a number to settle claims of Morning Foods plaintiffs; discuss and determine status of work process to complete and produce Answer to Interrogatories to respond to defendant's discovery demands
11/25/2014	MD	1.8	DG/MD/JP/MR/AN/KW litigation team meeting to explore and determine depositions to notice- specific individual Account Managers, Zone Managers, Productivity Managers, 30(b)(6) general Notice and 30(b)(6) for Wal-Mart and time studies; determine work needed and timeframe to respond to defendant's request for a number to settle claims of Morning Foods plaintiffs; discuss and determine status of work process to complete and produce Answer to Interrogatories to respond to defendant's discovery demands
11/25/2014	DG	1.8	DG/MD/JP/MR/AN/KW litigation team meeting to explore and determine depositions to notice- specific individual Account Managers, Zone Managers, Productivity Managers, 30(b)(6) general Notice and 30(b)(6) for Wal-Mart and time studies; determine work needed and timeframe to respond to defendant's request for a number to settle claims of Morning Foods plaintiffs; discuss and determine status of work process to complete and produce Answer to Interrogatories to respond to defendant's discovery demands
11/25/2014	JP	1.8	DG/MD/JP/MR/AN/KW litigation team meeting to explore and determine depositions to notice- specific individual Account Managers, Zone Managers, Productivity Managers, 30(b)(6) general Notice and 30(b)(6) for Wal-Mart and time studies; determine work needed and timeframe to respond to defendant's request for a number to settle claims of Morning Foods plaintiffs; discuss and determine status of work process to complete and produce Answer to Interrogatories to respond to defendant's discovery demands

Date	Staff	Amount of Time	Description
11/25/2014	MR	1.8	DG/MD/JP/MR/AN/KW litigation team meeting to explore and determine depositions to notice- specific individual Account Managers, Zone Managers, Productivity Managers, 30(b)(6) general Notice and 30(b)(6) for Wal-Mart and time studies; determine work needed and timeframe to respond to defendant's request for a number to settle claims of Morning Foods plaintiffs; discuss and determine status of work process to complete and produce Answer to Interrogatories to respond to defendant's discovery demands
11/25/2014	KW	0.3	review responses to first questions to plaintiffs to determine responses to number of hours worked per week by Morning Foods employees-to possibly inform damages calculations requested by defendant .3
11/25/2014	AG	0.5	Correct Dockets naming convention to proper docket abbreviations format
11/25/2014	KW	0.1	MD/KW review deposition transcript changes to be made for deposition transcript of [client]- .1
11/25/2014	AN	0.2	File Plaintiff's response to Def. ROGS and RFAS in file cabinet
11/25/2014	KW	0.9	MR/JP/KW work on Reviewing responses, explaining and understanding how to use excel sheet of exported questions responses to be flowed into Answer to Interrogatories for each plaintiff .9
11/25/2014	JP	0.2	jp/kw discussion of details of primary job duty of TMs in Billings who received OT payments discussion of interrogatories and document requests to defendant regarding lawsuits and DOL investigations
11/25/2014	MD	0.1	MD/KW review deposition transcript changes to be made for deposition transcript of [client]- .1
11/25/2014	KW	0.3	Begin to prepare ERRATA sheet to email to deponent [client] for signature .3
11/25/2014	MR	4.3	work on matchup of class list to TM clients
11/25/2014	MD	0.3	md emailing with defense counsel about extension of time to respond to discovery requests 0.3
11/25/2014	JP	0.9	MR/JP/KW work on Reviewing responses, explaining and understanding how to use excel sheet of exported questions responses to be flowed into Answer to Interrogatories for each plaintiff .9
11/25/2014	MR	0.9	MR/JP/KW work on Reviewing responses, explaining and understanding how to use excel sheet of exported questions responses to be flowed into Answer to Interrogatories for each plaintiff .9
11/25/2014	KW	0.2	scan correspondence from Atkinson Baker regarding deposition transcript of [client] .1 update electronic file .1
11/25/2014	KW	0.6	jp/kw begin to review questions responses to determine which responses are ready to be put into Answer to Interrogatories form and emailed to plaintiff for review .4 identify areas that need to be verified- for ex. documents needing to be produced .2
11/25/2014	MR	2	work on setup of new ver of questionnaire results (431 responses) .3, create formulas to Merge answers in 26 into 24, 27 into 25 .4, create formulas for indicator tables 1.2, edit headers .1
11/25/2014	KW	1.8	DG/MD/JP/MR/AN/KW litigation team meeting to explore and determine depositions to notice- specific individual Account Managers, Zone Managers, Productivity Managers, 30(b)(6) general Notice and 30(b)(6) for Wal-Mart and time studies; determine work needed and timeframe to respond to defendant's request for a number to settle claims of Morning Foods plaintiffs; discuss and determine status of work process to complete and produce Answer to Interrogatories to respond to defendant's discovery demands
11/26/2014	MR	0.6	additional work on TM client matchup examining email addresses to confirm some questionable matches .6

Date	Staff	Amount of Time	Description
11/26/2014	MR	5.9	Complete clients matchup .2; Create missing clients sheet .7; investigate some of these missing client names .3; Create diff state sheet and questionable sheet 1.2; investigate some of these questionable matches .4; Create matchup of class .1; opt-out .1, Create matchup of intake 1.3; Examine previous 15.2 missing list .1; Combine five payroll sheets .5; examine prior notes about payroll .3; examine Clifton deposition about 48093 .4; examine position codes in 33427 .3
11/29/2014	MR	1.2	review final template to rogs .3; email to attys/paras about same .2, fix excel add-in concatenator in Excel output sheet .3, create preliminary version of new version questionnaire output for attys/para to review .7
12/1/2014	MR	0.3	MR/KW review status of discovery production of Interrogatories to Defendant .1 plan needed and determine next steps to get production to defendant .2
12/1/2014	DG	0.2	edits to answer to interrogatories form .2
12/1/2014	MR	0.4	mr/jp/kw review needed changes to template for Answer to Interrogatories .1 discuss which issues can be resolved through technology and which interrogatories need individual attention .2 determine information needed by IT to proceed with flowing questions responses into Answer to Interrogatories .1
12/1/2014	KW	0.1	respond to plaintiff's questions regarding filing consent to sue .1
12/1/2014	JP	0.4	mr/jp/kw review needed changes to template for Answer to Interrogatories .1 discuss which issues can be resolved through technology and which interrogatories need individual attention .2 determine information needed by IT to proceed with flowing questions responses into Answer to Interrogatories .1
12/1/2014	KW	0.6	jp/kw revise spreadsheet to facilitate review of individual questions responses prior to production to defendant .3 determine tasks to be completed and assign a timeframe and staffing .3
12/1/2014	MR	0.3	read, investigate and reply to DG email about sequential numbering problem in answers to rogs
12/1/2014	KW	0.3	respond to questions from plaintiff [client] re work conditions and potential impact of lawsuit on working conditions .2 update current address information in electronic file.1
12/1/2014	JP	0.6	jp/kw revise spreadsheet to facilitate review of individual questions responses prior to production to defendant .3 determine tasks to be completed and assign a timeframe and staffing .3
12/1/2014	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker (ltr to D. re: [client] deposition transcripts)
12/1/2014	KW	0.2	read email from plaintiff regarding discovery process .1 forward to paralegal JP with questions re this plaintiff .1
12/1/2014	CLER	0.1	create PDF format of TM/RSR questions recd from client
12/1/2014	KW	0.3	telephone calls from and to [client]- concerning responses to Interrogatories and document production .2 add information to case notes .1
12/1/2014	MR	0.7	email detailed write-up of Kellogg matchup work to attys/para .5, prepare spreadsheet for checking missing/questionable matches .2
12/1/2014	KW	0.5	begin to review Answer to Interrogatories .3; notate issues to be resolved in flowing responses from questions to template for Answer to Interrogatories;.1 email issues and questions to IT Specialist .1
12/1/2014	MA	0.1	call from opt-in [client] re: documents
12/1/2014	CLER	0.2	create PDF format of TM/RSR questions recd from clients

Date	Staff	Amount of Time	Description
12/1/2014	JP	0.6	jp/kw review questions responses and identify issues to be resolved to produce to defendant .6
12/1/2014	KW	0.6	jp/kw review questions responses and identify issues to be resolved to produce to defendant .6
12/1/2014	CLER	0.5	create PDF format of documents recd from client ([client])
12/1/2014	MD	0.1	md/kw confer regarding electronic file of plaintiffs' objections to Interrogatories .1
12/1/2014	KW	0.1	md/kw confer regarding electronic file of plaintiffs' objections to Interrogatories .1
12/1/2014	KW	0.3	MR/KW review status of discovery production of Interrogatories to Defendant .1 plan needed and determine next steps to get production to defendant .2
12/1/2014	MR	1.9	research approaches to mail Merge into individual documents and email Merge with individual attachments
12/1/2014	MR	1	correct both versions of preliminary answers to rogs for merged number errors 1.0
12/1/2014			mr/jp/kw review needed changes to template for Answer to Interrogatories .1 discuss which issues can be resolved through technology and which interrogatories need individual attention .2 determine information needed by IT to proceed with flowing questions responses into Answer to Interrogatories .1
	KW	0.4	
12/1/2014	MD	0.3	md drafting discovery responses to Kellogg's discovery demands 0.3
12/2/2014	KW	0.2	MD/KW review of process and status of Discovery Production to defendant .2
12/2/2014	MR	0.1	read JP email and reply to [client] about deleting dup TM contacts
12/2/2014			jp/kw/mr review spreadsheet of discrepancies between class list and TM client list, discuss issues related to the discrepancies; determine plan of action to resolve the discrepancies -resolution needed to proceed with damages calculation for Morning Foods plaintiffs .5
	KW	0.5	
12/2/2014	MD	0.2	MD/KW review of process and status of Discovery Production to defendant .2
12/2/2014	MD	0.1	MD/KW confer regarding importance of report of hourly docking by Kellogg .1
12/2/2014	MR	1.5	perform match-up of payroll with client list and class list
12/2/2014	JS	0.3	strip formatting from eml for plt [client] for JP review
12/2/2014	KW	0.2	update electronic file of questions completed and returned to us by USPS .2
12/2/2014	KW	0.1	MD/KW confer regarding importance of report of hourly docking by Kellogg .1
12/2/2014	AG	0.3	research filings of Consent to Sues of [client]/[client]
12/2/2014	JP	0.1	AG/JP discussion on filing of Consent to Sue of [client]
12/2/2014	CLER	0.1	create PDF format of TM/RSR questions recd from client ([client])
12/2/2014			telephone call from plaintiff to discuss his claims against Kellogg --and proof that he was docked on an hourly basis while a TM at Kellogg .3 add information to case notes .1
	KW	0.4	
12/2/2014	KW	0.8	prepare spreadsheet to track responses to questions and production of Interrogatories and documents to defendant .8
12/2/2014	MD	0.2	AG/MD discussion on filing of Consent to Sue of [client]
12/2/2014	AG	0.1	AG/JP discussion on filing of Consent to Sue of [client]
12/2/2014	AG	0.2	AG/MD discussion on filing of Consent to Sue of [client]
12/2/2014	KW	0.4	jp/kw determine process regarding plaintiff review of completed Answer to Interrogatories .2 draft email to attorneys for review and approval .2
12/2/2014	MR	2.6	work on configuring excel sheet for new version of questionnaire results (503 responses) 2.4; read and reply to email about Kellogg interrog process .2
12/2/2014	JP	0.2	JP/MR follow-up on issues regarding questionnaire results processing into rogs
12/2/2014	AG	0.1	email client (FedEx mailing label for mailing of documents)



Date	Staff	Amount of Time	Description
12/2/2014	MR	0.2	JP/MR follow-up on issues regarding questionnaire results processing into rogs
12/2/2014			continued research and test approaches to mail Merge individual documents 2.7;
	MR	5.5	research and test approaches for word-to-outlook Merge individual attachments to emails 2.8
12/2/2014	CLER	0.2	prepare FedEx mailing label for mailing of documents by client
12/2/2014			JP/KW finalize plan to review Interrogatory responses prior to production to defendant;
	JP	0.4	finalize plan to review and produce documents to defendant; clarify and update tracking spreadsheet
12/2/2014	JP	0.4	JP/MR discuss Kellogg rog production process .2, Kellogg client/class list match-up .2
12/2/2014	MR	0.4	JP/MR discuss Kellogg rog production process .2, Kellogg client/class list match-up .2
12/2/2014			JP/KW finalize plan to review Interrogatory responses prior to production to defendant;
	KW	0.4	finalize plan to review and produce documents to defendant; clarify and update tracking spreadsheet
12/2/2014	DG	0.3	review interrogatory procedures for 850 answers to interrogs .3
12/2/2014			jp/kw/mr review spreadsheet of discrepancies between class list and TM client list, discuss issues related to the discrepancies; determine plan of action to resolve the discrepancies -resolution needed to proceed with damages calculation for Morning Foods plaintiffs .5
	MR	0.5	
12/2/2014			jp/kw/mr review spreadsheet of discrepancies between class list and TM client list, discuss issues related to the discrepancies; determine plan of action to resolve the discrepancies -resolution needed to proceed with damages calculation for Morning Foods plaintiffs .5
	JP	0.5	
12/3/2014	MR	0.2	send email to paras updating them about Kellogg client list matchup with payroll
12/3/2014			mr/jp/kw determine technology issues which need resolution to produce answer to interrogatories to individual plaintiffs for review and then to defendant determine information needed and technology work to be completed to track Answers and document production
	KW	0.8	
12/3/2014	AN	1	DG/MD/MR/JLP/KW/AN Team Meeting
12/3/2014	DG	1	DG/MD/MR/JLP/KW/AN Team Meeting
12/3/2014	JP	1	DG/MD/MR/JLP/KW/AN Team Meeting
12/3/2014	KW	1	DG/MD/MR/JLP/KW/AN Team Meeting
12/3/2014	MD	1	DG/MD/MR/JLP/KW/AN Team Meeting
12/3/2014			jp/kw draft and finalize explanatory email to plaintiffs to secure finalized answer to interrogatories .4
	KW	0.4	
12/3/2014	MR	0.4	move all work files from lab computer to server .2, reorganize files .2
12/3/2014	CLER	0.5	Verify client info in TM vs CTS Forms
12/3/2014	MR	1	DG/MD/MR/JLP/KW/AN Team Meeting
12/3/2014			mr/jp/kw determine technology issues which need resolution to produce answer to interrogatories to individual plaintiffs for review and then to defendant determine information needed and technology work to be completed to track Answers and document production
	MR	0.8	
12/3/2014			mr/jp/kw determine technology issues which need resolution to produce answer to interrogatories to individual plaintiffs for review and then to defendant determine information needed and technology work to be completed to track Answers and document production
	JP	0.8	
12/3/2014			jp/kw draft and finalize explanatory email to plaintiffs to secure finalized answer to interrogatories .4
	JP	0.4	

Date	Staff	Amount of Time	Description
12/3/2014	DG	0.2	dg/kw revise and finalize cover email to plaintiffs for Answer to Interrogatories .2
12/3/2014	KW	0.6	jp/kw discuss problems to be conquered in reviewing individual comment responses of 450 plaintiffs prepare questions to track responses determine tasks and determine who will do what .6
12/3/2014	DG	0.1	decide dates for interrog answer Merge - objection and client signature Merge .1
12/3/2014	JP	0.6	jp/kw discuss problems to be conquered in reviewing individual comment responses of 450 plaintiffs prepare questions to track responses determine tasks and determine who will do what .6
12/3/2014	AN	0.5	Add to 'to do' list as result of today's team meeting
12/4/2014	MR	0.1	JP/MR discuss updating of questionnaire output spreadsheet
12/4/2014	MR	0.1	read through email exchange with Def Counsel related to ESI 30b6 follow-up deponent
12/4/2014	MD	0.1	MD/MR briefly discuss ltr to Def C about 30b6 ESI follow-up deponent
12/4/2014	MR	3.7	perform match-up of TM and Kellogg unique identifiers and email addresses with questions excel sheet of 503 responses
12/4/2014	JP	0.1	JP/MR discuss updating of questionnaire output spreadsheet
12/4/2014	MR	0.1	MD/MR briefly discuss ltr to Def C about 30b6 ESI follow-up deponent
12/4/2014	MR	0.1	read email exchange relating to ltr to Def C about 30b6 ESI follow-up deponent
12/4/2014	DG	0.2	review info re IT deponents .1; draft email to James Boudreau re IT deposition .1
12/4/2014	KW	0.6	review questions responses prior to them being merged into Answer to Interrogatories to be sent to plaintiff for final review and then to defendant
12/4/2014	DG	0.2	review interrog answers of concern .2
12/4/2014	MD	0.2	md/jp/kw discussing issues arising for rog responses and whether changes are needed to template response and whether TSR needs to respond to the rogs 0.2
12/4/2014	KW	0.2	md/jp/kw discussing issues arising for rog responses and whether changes are needed to template response and whether TSR needs to respond to the rogs 0.2
12/4/2014	KW	1.4	review 200 questions open ended responses prior to flowing into Answer to Interrogatories pull those requiring attorney review
12/4/2014	JP	0.4	jp/kw confer re status of questions response reviews prioritize tasks to be completed
12/4/2014	CLER	0.3	create PDF format of TM/RSR questions recd from client ([client][client][client])
12/4/2014	JP	0.2	md/jp/kw discussing issues arising for rog responses and whether changes are needed to template response and whether TSR needs to respond to the rogs 0.2
12/4/2014	KW	0.4	jp/kw confer re status of questions response reviews prioritize tasks to be completed
12/4/2014	MD	0.3	md reviewing rog responses 0.3
12/4/2014	MA	0.1	call from opt-in [client] re: interrogatories
12/4/2014	KW	0.8	complete review of responses written by over 400 plaintiffs to be produced to defendant .6 draft summary memo to attorney .2
12/4/2014	MR	0.2	locate prior email with names of possible 30b6 ESI follow-up deponents and email to attys/para
12/4/2014	MR	0.1	read and reply to email from para JP about questions response comment review

Date	Staff	Amount of Time	Description
12/4/2014	MR	0.1	read resp from Def C regarding follow-up ESI deponent
12/4/2014	MR	0.6	update Excel questions results sheets for proper last name and fixed concatenation function
12/5/2014	CLER	2	Verify client information on CTS forms with Time Matters
12/5/2014	JP	0.2	JLP/AN Confer regarding client info in Time Matters
12/5/2014	AN	0.2	JLP/AN Confer regarding client info in Time Matters
12/5/2014			prep and perform email of Answers to Rogs to Group B: pull in TM and Class List unique codes and email addresses into SM results spreadsheet .5, review and correct mistakes in email addresses and names in Group B .7, prep template for Answers to Rogs .2, perform mail Merge to template .2, check and correct major problem in Merge data 1.0, rerun mail Merge to template .1, check over again .3, set up Merge to Outlook cover letter and attachment-to-email Merge spreadsheet .7, research issue and fix Outlook being able to set off-line .5, perform Merge to Outlook .2, review emails in Outbox .2, send out emails .1, regular checking on email progress .3, manually send emails that stayed in Outbox. .1
	MR	5.1	
12/5/2014	JP	0.1	JP/CM discuss status of CTS cross-checking (.1)
12/5/2014	CM	0.1	JP/CM discuss status of CTS cross-checking (.1)
12/5/2014	DG	0.4	draft letter to individuals identified by K as not proper members of the FLSA class .4
12/8/2014	CLER	0.1	create PDF format of document recd from client ( [client])
12/8/2014			md/kw review information needed for deposition of state class representative [client]-scheduled for tomorrow .1 review status of responses to defendant's discovery demands
	KW	0.2	.1
12/8/2014	CLER	0.1	create PDF format of document recd from client ([client])
12/8/2014	JP	0.4	md/dg/kw/jp discussing opt-in discovery production 0.4 jp (dg/kw/md 0.7)
12/8/2014			JP/KW litigation paralegal meeting to determine tasks related to deposition notices, plaintiff document review and production, correcting information in Answer to Interrogatories and document review of box of documents sent by plaintiff SW
	JP	0.8	
12/8/2014	CLER	0.3	create PDF format of TM/RSR questions recd from client ( [client] [client] [client])
12/8/2014	KW	0.2	review questions responses received by mail .2
12/8/2014	DG	0.7	md/dg/kw/jp discussing opt-in discovery production 0.4 jp (dg/kw/md 0.7)
12/8/2014	MD	0.7	md/dg/kw/jp discussing opt-in discovery production 0.4 jp (dg/kw/md 0.7)
12/8/2014	KW	0.7	md/dg/kw/jp discussing opt-in discovery production 0.4 jp (dg/kw/md 0.7)
12/8/2014			work on prep for Kellogg MF damages: work on data sources of payroll data, BSN 40293, and BSN 33427 identifying and matching MF clients and work periods to class list 4.0, create CTS lookup 1.0, create payroll dates conversion .5; perform analysis of various columns in 40293 .5, create zone to state comparison in best attempt to identify states of employment 1.5, match up with list of pled states and their SOL and LD statutes .6
	MR	8.1	
12/8/2014	MR	0.3	MR/KW- review prepared spreadsheet to track responses to questions and to Answer to Interrogatories. track contacts with plaintiffs and responses
12/8/2014			JP/KW litigation paralegal meeting to determine tasks related to deposition notices, plaintiff document review and production, correcting information in Answer to Interrogatories and document review of box of documents sent by plaintiff [client]
	KW	0.8	
12/8/2014	KW	0.3	MR/KW- review prepared spreadsheet to track responses to questions and to Answer to Interrogatories. track contacts with plaintiffs and responses

Date	Staff	Amount of Time	Description
12/8/2014	KW	0.1	read through emails and reports to be current re tracking production of discovery responses to defendant .1
12/8/2014	KW	0.1	update electronic contact information
12/8/2014	KW	0.4	respond to questions from plaintiff [client] who did not understand the Interrogatory questions .3 add information to case notes .1
12/8/2014	AG	0.2	Review CTS status of [client] (withdrawal date)
12/8/2014	MR	0.6	pulled TM code Class List code, TM name (last name first) into Document Tracking spreadsheet .5, email to paras about same .1
12/8/2014	CLER	0.5	create PDF format of documents recd from client ([client])
12/8/2014	KW	0.2	telephone call form plaintiff regarding questions responses and documents to fax in response to discovery requests .1 add information to case notes .1
12/8/2014	KW	1.5	review, sort, organize and catalogue box of documents sent by plaintiff [client] in response to defendant's discovery requests
12/8/2014	MD	0.2	md/kw review information needed for deposition of state class representative [client]-scheduled for tomorrow .1 review status of responses to defendant's discovery demands .1
12/8/2014	KW	0.3	respond to email form plaintiff regarding case update .2 update electronic file of contact information for this plaintiff [client] .1
12/9/2014	KW	0.2	jp/kw discuss responses of 2 plaintiffs which plaintiffs need to modify to more accurately respond to the questions
12/9/2014	CLER	2.2	create PDF format of documents recd from client ([client])
12/9/2014	MR	0.2	read and reply to email about possible 30b6 ESI follow-up deponents
12/9/2014	CLER	0.2	prepare FedEx mailing label for client mailing of documents
12/9/2014	MR	0.1	email to paras regarding next steps with Answers to Rogs
12/9/2014	DG	0.3	preparing response to Boudreau re topics IT deponent needs to be prepared about .3
12/9/2014	JP	0.2	jp/kw discuss responses of 2 plaintiffs which plaintiffs need to modify to more accurately respond to the questions
12/9/2014	MR	7.3	work on Kellogg Morning Foods damage calculations 5.8, further qualification of data from 48063 and 33427 1.0, several emails to attys/paras regarding same .3, detailed email with totals sent to attys/paras .2
12/9/2014	DG	0.3	dg/KW discuss prior discussion w James Boudreau re settlement .1; email to MR re damage methodology for morning food settlement discussion .2
12/9/2014	KW	0.1	dg/KW discuss prior discussion w James Boudreau re settlement .1;
12/9/2014	AG	0.1	email client (FedEx mailing label for mailing of documents)
12/9/2014	CLER	1	Verify client information on CTS forms with Time Matters
12/9/2014	KW	2.9	review, redact and Bates stamp plaintiff documents for production to defendant in response to discovery demands
12/9/2014	KW	0.2	telephone call to respond to plaintiff [client]'s questions about Answer to Interrogatories .2
12/10/2014	KW	0.4	review completed Answer to Interrogatories in Word and PDF versions to pull those of named plaintiffs for attorney review .4
12/10/2014	KW	1.4	DG/MR/JP/AN/KW Litigation team meeting to provide an update for all team members regarding status and progress of responding to defendant's discovery demands Discuss and analyze damages calculations work to be shared with defendant

Date	Staff	Amount of Time	Description
12/10/2014	KW	2.3	review documents provided by plaintiffs in response to defendant's discovery demands redact as needed Bates Stamp to prepare for production to defendant' add information to spreadsheet tracking document production add information to spreadsheet tracking individual plaintiff responses save originals and Bates Stamped files to appropriate files
12/10/2014	DG	0.1	respond to client inquiry re resumes and computer that is now broken .1
12/10/2014	JS	0.1	call from plt [client]; sent to JP vm
12/10/2014	CLER	0.4	create PDF format of documents recd from client ([client])
12/10/2014	MR	0.2	set up and take down laptop and projector for case mtg
12/10/2014	AN	0.2	Retrieve client documents for return to client
12/10/2014	AN	0.3	Draft thank you letter for plaintiffs who responded to the questions
12/10/2014	JS	0.1	plt [client] called with question re: discovery materials, what and how to send
12/10/2014	KW	0.7	begin to prepare spreadsheet detailing document requests -document requests 1-6-made to defendant and their responses
12/10/2014	KW	0.6	complete spreadsheet to track responses to PLT Document requests to Defendant-completed spreadsheet for 1st Doc. Request
12/10/2014	KW	0.5	telephone call from plaintiff [client]- did not receive questions .2 print questions and cover instructions .1 prepare for mailing .1 add information to tracking spreadsheets .1
12/10/2014	JP	0.5	JP/.MR/KW work out problems and successfully send 427 files of Answers to Interrogatories and plaintiff document production to defendant
12/10/2014	MR	0.5	JP/.MR/KW work out problems and successfully send 427 files of Answers to Interrogatories and plaintiff document production to defendant
12/10/2014	MA	0.1	assisting KW to create discovery tracking spreadsheet
12/10/2014	KW	0.5	JP/.MR/KW work out problems and successfully send 427 files of Answers to Interrogatories and plaintiff document production to defendant
12/10/2014	DG	0.1	edit letter to clients re interrogatory answers and documents .1
12/10/2014	MD	6	md travel from deposition 6.0
12/10/2014	AG	0.9	review and cross check documents produced by client for duplications
12/10/2014	CLER	0.2	prepare FedEx mailing label for client mailing of documents
12/10/2014	AG	0.1	email client (FedEx mailing label for mailing of documents)
12/10/2014	DG	0.1	DG/KW finalize cover letter to accompany production to defendant
12/10/2014	KW	0.1	DG/KW finalize cover letter to accompany production to defendant
12/10/2014	DG	0.1	review emails from MR re damage calculations .1
12/10/2014	AG	0.3	packing of o[client]. documents of client ([client])
12/10/2014	CLER	0.2	prepare FedEx Label for mailing of o[client]. documents to client ([client])
12/10/2014	JP	1.4	DG/MR/JP/AN/KW Litigation team meeting to provide an update for all team members regarding status and progress of responding to defendant's discovery demands Discuss and analyze damages calculations work to be shared with defendant
12/10/2014	DG	1.4	DG/MR/JP/AN/KW Litigation team meeting to provide an update for all team members regarding status and progress of responding to defendant's discovery demands Discuss and analyze damages calculations work to be shared with defendant
12/10/2014	KW	0.7	fact finding interview with plaintiff [client] to revise responses to Answer to Interrogatories .4 make revisions to Word document .1 print to pdf for Production to defendant .1 email pdf to plaintiff for final review .1

Date	Staff	Amount of Time	Description
12/10/2014	MR	1.4	DG/MR/JP/AN/KW Litigation team meeting to provide an update for all team members regarding status and progress of responding to defendant's discovery demands Discuss and analyze damages calculations work to be shared with defendant
12/10/2014	AN	1.4	DG/MR/JP/AN/KW Litigation team meeting to provide an update for all team members regarding status and progress of responding to defendant's discovery demands Discuss and analyze damages calculations work to be shared with defendant
12/11/2014	KW	0.6	JP/KW finalize instruction emails to plaintiffs who submitted incomplete questions and a separate email to plaintiffs who did not complete a questions response finalize email to all plaintiffs concerning questions results
12/11/2014	JS	0.1	call from plt JG asking to re-send the email (bad email address, was unable to receive)
12/11/2014	CLER	0.3	create PDF format of documents recd from client ([client])
12/11/2014	DG	0.5	review email to incomplete questions interrog answerers .1; edit email to those who didn't take questions .2; edit email to entire group of plaintiffs re questions/answers/need to send docs .2
12/11/2014	JP	0.6	JP/KW finalize instruction emails to plaintiffs who submitted an incomplete questions and a separate email to plaintiffs who did not complete a questions response finalize email to all plaintiffs concerning questions results
12/11/2014	CLER	0.3	create PDF format of documents recd from client ([client])
12/11/2014	MR	0.3	send detailed reply email to attys in regard to need for experienced SAP administrator as deponent and relevant topics for follow-up ESI 30b6 .2, review our original 30b6 notice .1
12/11/2014	KW	1.3	JP/KW Resolve discrepancies and update data regarding Discovery production to defendant review first and second document requests and coordinate spreadsheets to determine and track which requests have been provided and which have not discuss depositions to be noticed and determine tasks to be completed to Notice depositions determine next steps and emails needed to reach out to non-responsive plaintiffs
12/11/2014	CLER	0.1	create PDF format of documents recd from client ([client])
12/11/2014	DG	0.7	dg/kw/jp discuss all the criteria we need to use to select deponents .4; prepare outline of all the things we need deponents to cover .3
12/11/2014	MR	0.1	send additional reply email to attys in regard to relevant topics for follow-up ESI 30b6 create spreadsheet with a cell for each request of 1st and 2nd PLT Requests for Documents sent to Defendant organize electronic file of PLT Discovery requests to Defendant
12/11/2014	KW	1.8	
12/11/2014	CLER	2	Verify client information on CTS forms with Time Matter
12/11/2014	MR	0.1	notes on additional work needed for Kellogg MF damage calcs
12/11/2014	CLER	0.2	prepare FedEx mailing label for client mailing of documents
12/11/2014	AG	0.1	email client (FedEx mailing label for mailing of documents)
12/11/2014	KW	2.1	Complete review of all PLT Document requests and Def. responses Complete spreadsheet ot track Document Requests, Responses and Def. Production
12/11/2014	JP	1.3	JP/KW Resolve discrepancies and update data regarding Discovery production to defendant review first and second document requests and coordinate spreadsheets to determine and track which requests have been provided and which have not discuss depositions to be noticed and determine tasks to be completed to Notice depositions determine next steps and emails needed to reach out to non-responsive plaintiffs



Date	Staff	Amount of Time	Description
12/11/2014	KW	0.4	dg/kw/jp discuss all the criteria we need to use to select deponents .4
12/11/2014	JP	0.4	dg/kw/jp discuss all the criteria we need to use to select deponents .4
12/12/2014	CLER	0.1	Create PDF format of documents recd from client ([client])
12/12/2014	CLER	0.3	Create PDF format of documents recd from client ([client])
12/12/2014	CLER	1	Verify client info on CTS forms with time matters
12/12/2014	CLER	0.3	Create PDF format of documents recd from client ([client])
12/13/2014	MR	2.1	GA transfer remaining csv files from server to lab computer .2, continue to process Def logsdata, deduction and settlement csv data files into unparsed xlsb data using scripts and formulas 1.9
12/15/2014	JP	0.5	JP/KW review and modify document production tracking spreadsheets .3 discuss and resolve issues regarding production changes for individual plaintiffs .2
12/15/2014	DG	0.3	prepare draft amendment of interrogatory answers for individuals who answered they had documents, but in fact did not .3
12/15/2014	KW	0.5	Review, organize, redact and Bates Stamp documents of 5 plaintiffs for production to defendant
12/15/2014	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
12/15/2014	KW	0.5	JP/KW review and modify document production tracking spreadsheets .3 discuss and resolve issues regarding production changes for individual plaintiffs .2
12/15/2014	CLER	0.2	prepare welcome ltr to new client
12/15/2014	CLER	0.3	Create PDF format of documents recd from client ([client])
12/15/2014	CLER	0.2	Create PDF format of documents recd from client ([client])
12/15/2014	CLER	0.1	Create PDF format of documents recd from client
12/15/2014	KW	5.3	review documents sent by plaintiffs in response to defendant's discovery demands redact as needed organize and Merge into coherent pdfs Bates Stamp for each of 22 individual plaintiff files add information to document tracking spreadsheet and plaintiff's information spreadsheet use Send6 to produce documents to defendant
12/15/2014	CLER	0.1	Data Entry of contact information of client
12/15/2014	KW	0.2	telephone call from plaintiff [client] to discuss need to revise his Answer to Interrogatories.
12/15/2014	CLER	0.3	Create PDF format of documents recd from client ([client])[client][client]and[client])
12/15/2014	KW	0.5	review documents produced by plaintiff in response to defendant's demands .3 telephone call to plaintiff [client] to clarify highlighting on documents to determine if redaction is needed. .1 email to plaintiff to secure response question about need for redaction .1
12/15/2014	KW	0.1	read email discussion of how to proceed and propose plan to follow up with plaintiff.1
12/15/2014	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue of David M. Fairbrother)
12/15/2014	CLER	0.2	Create PDF format of documents recd from client ([client])
12/15/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#288 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue of David M. Fairbrother)(Dunn, Matt)
12/15/2014	CLER	0.3	Create PDF format of documents recd from client ([client])
12/15/2014	CLER	0.2	Create PDF format of documents recd from client ([client])
12/15/2014	CLER	0.1	Create PDF format of documents recd from client ([client])

Date	Staff	Amount of Time	Description
12/16/2014	KW	1.5	review, organize, redact and prepare plaintiff documents for Bates Stamping and production to defendant in response to Discovery demands
12/16/2014	MD	1.5	md drafting 30b6 Notice regarding Kellogg's work with Sam's/Walmart 1.5
12/16/2014	KW	0.4	JP/KW determine how to proceed regarding amending plaintiff [client]'s Interrogatory-review spreadsheet to tracking Def. Response to Document Production and determine next steps to determine priority of documents needed and how to track responsiveness of defendant
12/16/2014	KW	0.2	draft cover explanatory email email Amended Answer to Interrogatories to plaintiff [client] for approval
12/16/2014	KW	0.3	prepare Amended Answer to Interrogatories .3
12/16/2014	MD	0.1	md/ms discussing deadline to respond to Kellogg's motion for judgment on the pleadings 0.1
12/16/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#289 - MOTION for Judgment on the Pleadings by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1) Proposed Order) Noting Date 1/9/2015, (Nelson, James)
12/16/2014	DG	0.1	md/ms discussing deadline to respond to Kellogg's motion for judgment on the pleadings 0.1
12/16/2014	KW	0.2	MD/KW- review documents produced by plaintiff [client] to determine which need attorney review-.2
12/16/2014	MD	0.2	MD/KW- review documents produced by plaintiff [client] to determine which need attorney review-.2
12/16/2014	KW	0.2	AN/KW review latest document production from defendant to determine most efficient way to organize to be accessible to litigation team
12/16/2014	AN	0.2	AN/KW review latest document production from defendant to determine most efficient way to organize to be accessible to litigation team
12/16/2014	CLER	0.3	File Deposition Exhibits
12/16/2014	DG	0.1	review [client] business mileage log .1
12/16/2014	JP	0.4	JP/KW determine how to proceed regarding amending plaintiff [client]'s Interrogatory-review spreadsheet to tracking Def. Response to Document Production and determine next steps to determine priority of documents needed and how to track responsiveness of defendant
12/16/2014	CLER	0.2	Create PDF format of documents recd from client ([client])
12/16/2014	CLER	0.3	Create PDF format of documents recd from client ([client])
12/16/2014	DG	0.1	md/dg discussing Kellogg's filing for judgment on the pleadings 0.1
12/16/2014	KW	1.5	Begin to review defendant's document production to determine which PLT Discovery requests have been produced add information to Master List spreadsheet-insert hyperlinks
12/16/2014	CLER	1.8	Create PDF format of documents recd from client ([client])
12/16/2014	MD	0.1	md/dg discussing Kellogg's filing for judgment on the pleadings 0.1
12/17/2014	JP	0.3	JP/KW coordinate second round of emails to incomplete questions responders and non-responsive plaintiffs-.3
12/17/2014	KW	2.1	Redact and Bates Stamp documents for 28 plaintiffs to be produced to defendant
12/17/2014	MR	0.7	MR/KW work on creating wordpass protected zip file of plaintiffs' document production to be burned to a CD and mailed to defendant .7
12/17/2014	KW	0.3	JP/KW coordinate second round of emails to incomplete questions responders and non-responsive plaintiffs-.3

Date	Staff	Amount of Time	Description
12/17/2014	KW	1.1	DG/MD/JP/MR/AN/KW Litigation team meeting focused on analyzing defendant's document production in light of Proof issues and documents still not produced
12/17/2014	CLER	0.2	Create PDF format of documents recd from client ([client])
12/17/2014	CLER	0.1	Create PDF format of documents recd from client ([client])
12/17/2014	CLER	0.2	prepare FedEx mailing label for client mailing of documents
12/17/2014	MD	0.2	md/mr discussing damage calculations 0.2
12/17/2014	AG	0.1	email client (FedEx mailing label for mailing of documents)
12/17/2014	DG	1.1	DG/MD/JP/MR/AN/KW Litigation team meeting focused on analyzing defendant's document production in light of Proof issues and documents still not produced
12/17/2014	MD	1.5	md researching potential deponents 1.5
12/17/2014	MD	1.1	DG/MD/JP/MR/AN/KW Litigation team meeting focused on analyzing defendant's document production in light of Proof issues and documents still not produced
12/17/2014	MD	0.2	md/mr discussing damage calculations 0.2
12/17/2014	JP	1.1	DG/MD/JP/MR/AN/KW Litigation team meeting focused on analyzing defendant's document production in light of Proof issues and documents still not produced
12/17/2014	MR	1.1	DG/MD/JP/MR/AN/KW Litigation team meeting focused on analyzing defendant's document production in light of Proof issues and documents still not produced
12/17/2014	KW	0.4	JP/MR/AN/KW Litigation paralegal analyze specific documents produced by plaintiffs - but not produced by defendant- create Potential Exhibit file for depositions of defendants
12/17/2014	AN	1.1	DG/MD/JP/MR/AN/KW Litigation team meeting focused on analyzing defendant's document production in light of Proof issues and documents still not produced
12/17/2014	MD	0.5	md call with defense counsel about various discovery issues 0.5
12/17/2014	AN	0.5	Review, label and index Def. Bates Stamped documents
12/17/2014	CLER	0.3	prepare mailing to client (return of o[client]. documents - Lamber Spain)
12/17/2014	KW	2.2	Bates Stamp and produce document production of plaintiffs to satisfy defendants' document demands
12/17/2014	MR	0.4	JP/MR/AN/KW Litigation paralegal analyze specific documents produced by plaintiffs - but not produced by defendant- create Potential Exhibit file for depositions of defendants
12/17/2014	AN	0.3	KW/AN Discuss folder organization for Bates Docs from Defendant
12/17/2014	JP	0.4	JP/MR/AN/KW Litigation paralegal analyze specific documents produced by plaintiffs - but not produced by defendant- create Potential Exhibit file for depositions of defendants
12/17/2014	AN	0.4	JP/MR/AN/KW Litigation paralegal analyze specific documents produced by plaintiffs - but not produced by defendant- create Potential Exhibit file for depositions of defendants
12/17/2014	CLER	0.3	organize documents sent by plaintiff in response to defendant's document request .2 scan for production preparation .1
12/17/2014	KW	0.7	MR/KW work on creating wordpass protected zip file of plaintiffs' document production to be burned to a CD and mailed to defendant .7
12/17/2014	MR	0.3	locate email from client who wanted me to contact her about Kellogg emails .2, send email to client about contact time to arrange for emails
12/17/2014	CLER	1	File client documents in file cabinet

Date	Staff	Amount of Time	Description
12/17/2014	MD	0.2	md/mr discussing damages calculations for RSRs and information needed from defense counsel 0.2
12/17/2014	CLER	0.3	prepare mailing to client (return of o[client]. documents - [client])
12/17/2014	MD	2	md drafting 30b6 Notice, including researching issues t include in notice, re Kellogg's work with Sam's/Walmart 2.0
12/17/2014	KW	0.3	KW/AN Discuss folder organization for Bates Docs from Defendant
12/17/2014	MR	0.2	md/mr discussing damages calculations for RSRs and information needed from defense counsel 0.2
12/18/2014	MD	0.1	md/dg discussing call to have with defense counsel about filing motions, mediation, and deposition of Kellogg's Walmart division 0.1
12/18/2014	DG	0.3	edit deposition notice to K re Walmart and Sam's club .3
12/18/2014	DG	0.1	md/dg discussing call to have with defense counsel about filing motions, mediation, and deposition of Kellogg's Walmart division 0.1
12/18/2014	MD	0.3	md edit and send deposition notice to defense counsel 0.3
12/18/2014	CLER	0.3	Create PDF format of documents recd from client ([client])
12/18/2014	CLER	2	Verify client info on CTS with that in Time Matters
12/18/2014	MD	0.3	md/dg discussing deposition of Kellogg regarding Walmart and md call with defense counsel yesterday 0.3
12/18/2014	DG	0.3	md/dg discussing deposition of Kellogg regarding Walmart and md call with defense counsel yesterday 0.3
12/18/2014	MD	0.2	md edit deposition notice to Kellogg re work with Walmart 0.2
12/19/2014	AN	0.2	Call to verify contact information
12/19/2014	CLER	0.2	PCF client (questions question [client])
12/19/2014	AN	0.2	Call to verify contact information
12/19/2014	MD	1.7	md/jp discussing depositions to take
12/19/2014	AN	0.2	Call to verify email address and discuss case with [client]
12/19/2014	JP	0.2	JLP/AN Discuss verification of client email addresses
12/19/2014	AN	0.2	JLP/AN Discuss verification of client email addresses
12/19/2014	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#290 - MOTION Strike untimely filed Consents to Sue by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Proposed Order) Noting Date 1/9/2015, (Nelson, James)
12/19/2014	CLER	2	Verify client info on CTS with that in Time Matters
12/19/2014	JP	1.7	md/jp discussing depositions to take
12/22/2014	KW	0.4	copy files of documents produced by plaintiffs in response to defendants' discovery demands to prepare for review, redaction, Bates stamping and production to defendant .4
12/22/2014	KW	0.9	download documents produced by defendant .3 organize production into usable segments .4 add information to document production tracking spreadsheet .1 email information to litigation team .1
12/22/2014	CLER	0.3	create PDF format of documents recd from client ([client])
12/22/2014	KW	0.2	respond to questions from plaintiff regarding current case developments
12/22/2014	CLER	0.5	create PDF format of documents recd from client ([client])
12/22/2014	JP	1.9	JP/KW-- review, analyze, organize a box of documents sent by plaintiff [client] in response to defendant's discovery demands
12/22/2014	KW	2.4	Review, Redact, organize and Bates Stamp plaintiff documents for production to defendant in response to defendant's discovery demands for individual responses from over 850 plaintiffs
12/22/2014	CLER	0.2	prepare mailing of returned documents to client ([client])

Date	Staff	Amount of Time	Description
12/22/2014	CLER	0.2	prepare mailing of returned documents to client ([client])
12/22/2014	MD	0.2	md coordinating call with defense counsel about call for discovery issues 0.2
12/22/2014	KW	0.3	Check all exhibits not being filed under seal to verify no need for redactions .3
12/22/2014	KW	1.9	JP/KW-- review, analyze, organize a box of documents sent by plaintiff [client] in response to defendant's discovery demands
12/22/2014	CLER	0.7	create PDF format of documents recd from client ([client])
12/23/2014	MD	0.2	md review documents for production by opt-in plaintiff 0.2
12/23/2014			JP/MR.KW Review categories of emails to send to plaintiffs to respond to defendant's discovery demands review calendars produced by plaintiff [client] to determine usefulness of data create spreadsheet of data to be entered for use in litigation
12/23/2014	JP	0.9	AN/KW track down contact information for plaintiff [client] prepare hard copy typed questions to gather information to respond to defendant's Interrogatories prepare directions for completing questions process
12/23/2014	KW	0.3	md/dg call with defense counsel about variety of discovery issues 0.5
12/23/2014	DG	0.5	Review documents of plaintiff [client] to determine need for redaction prior to production to defendant in response to defendant discovery demands
12/23/2014	KW	0.3	
12/23/2014			JP/MR.KW Review categories of emails to send to plaintiffs to respond to defendant's discovery demands review calendars produced by plaintiff [client] to determine usefulness of data create spreadsheet of data to be entered for use in litigation
12/23/2014	MR	0.9	md/dg call with defense counsel about variety of discovery issues 0.5
12/23/2014	MD	0.5	Bates Stamp documents for production Use HighTail to produce documents of 13 plaintiffs to defendant to respond to defendant's discovery demands
12/23/2014	KW	1.1	
12/23/2014			For plaintiffs: [client][client][client][client][client][client][client][client][client][client][client]and[client]- use plaintiffs' hand written hard copies of questions to complete draft of Answer to Interrogatories to be mailed to plaintiff for review, approval and signature prior to producing to defendant in response to defendant's discovery demands
12/23/2014	KW	2.7	
12/23/2014			JP/MR.KW Review categories of emails to send to plaintiffs to respond to defendant's discovery demands review calendars produced by plaintiff [client] to determine usefulness of data create spreadsheet of data to be entered for use in litigation
12/23/2014	KW	0.9	update and organize electronic files of discovery produced to defendant in response to discovery demands
12/23/2014	KW	0.4	
12/23/2014			MD/KW review status of deposition notices determine plan to identify deposition notices needed discuss defendant's demand for 50 more depositions of plaintiffs
12/23/2014	MD	0.3	draft explanatory email .2 email explanation and deposition transcript to deponent [client] .1
12/23/2014	KW	0.3	
12/23/2014	AN	0.5	Call and track clients regarding updating email addressed
12/23/2014			read hand written questions response to gather information to draft response to Answer to Interrogatories- draft Answers to be sent to plaintiff for review and approval
12/23/2014	KW	0.4	Review documents of plaintiff [client] to determine need for redaction prior to production to defendant in response to defendant discovery demands
12/23/2014	KW	0.3	
12/23/2014			md email defense counsel about production of additional fields for payroll records 0.1
12/23/2014	MD	0.1	
12/23/2014	MD	0.3	md/mr reviewing payroll documents for sufficiency of fields 0.3

Date	Staff	Amount of Time	Description
12/23/2014	MR	0.3	md/mr reviewing payroll documents for sufficiency of fields 0.3
12/23/2014	AN	0.3	AN/KW track down contact information for plaintiff [client] prepare hard copy typed survey to gather information to respond to defendant's Interrogatories prepare directions for completing questions process
12/23/2014	MD	0.2	md/dg discussing topics to cover during call with defense counsel regarding discovery issues 0.2
12/23/2014	DG	0.2	md/dg discussing topics to cover during call with defense counsel regarding discovery issues 0.2
12/23/2014	KW	0.3	MD/KW review status of deposition notices determine plan to identify deposition notices needed discuss defendant's demand for 50 more depositions of plaintiffs
12/23/2014	DG	0.2	md/mr discussing edits to spreadsheet to send to defense counsel for damage calculations 0.2
12/23/2014	MD	0.2	md/mr discussing edits to spreadsheet to send to defense counsel for damage calculations 0.2
12/23/2014	MD	0.2	md/mr discussing edits to spreadsheet to send to defense counsel for damage calculations 0.2
12/23/2014	CLER	0.9	create PDF format of documents recd from client ([client])
12/24/2014	KW	0.4	Review paper questions responses for plaintiff [client] to draft Answer to Interrogatories for plaintiff's review and approval .4
12/24/2014	AN	0.3	Prepare and sent postal mail regarding contact information, enclosing questionnaire
12/24/2014	MR	0.2	MR/KW research opt-outs of this litigation -to not send a new questions form to them discuss email list of on-responders to be sent a new questions
12/24/2014	AN	0.5	MD/JP/AN/KW DG/MD/JP/AN/KW meeting to research Kellogg positions and personnel to depose; determine content of 30(b)(1) deposition; content of 30(b)(6) deposition;
12/24/2014	JP	0.5	MD/JP/AN/KW DG/MD/JP/AN/KW meeting to research Kellogg positions and personnel to depose; determine content of 30(b)(1) deposition; content of 30(b)(6) deposition;
12/24/2014	CLER	2.5	create PDF format of documents recd from client ([client])
12/24/2014	MD	0.5	MD/JP/AN/KW DG/MD/JP/AN/KW meeting to research Kellogg positions and personnel to depose; determine content of 30(b)(1) deposition; content of 30(b)(6) deposition;
12/24/2014	KW	0.2	MR/KW research opt-outs of this litigation -to not send a new questions form to them discuss email list of on-responders to be sent a new questions
12/24/2014	KW	1.1	DG/MD/JP/AN/KW litigation team meeting to determine Kellogg positions and personnel to depose; content of 30(b)(1) deposition; content of 30(b)(6) deposition; report status and progress of PLT discovery production; report status and lack of progress in defendant discovery production
12/24/2014	KW	0.5	MD/JP/AN/KW DG/MD/JP/AN/KW meeting to research Kellogg positions and personnel to depose; determine content of 30(b)(1) deposition; content of 30(b)(6) deposition;
12/24/2014	KW	1.8	For plaintiffs: [client][client][client][client][client][client][client][client][client][client][client]and[c lient]- use plaintiffs' hand written hard copies of questions to complete draft of Answer to Interrogatories to be mailed to plaintiff for review, approval and signature prior to producing to defendant in response to defendant's discovery demands



Date	Staff	Amount of Time	Description
12/24/2014	DG	1.1	DG/MD/JP/AN/KW litigation team meeting to determine Kellogg positions and personnel to depose; content of 30(b)(1) deposition; content of 30(b)(6) deposition; report status and progress of PLT discovery production; report status and lack of progress in defendant discovery production
12/24/2014	JP	1.1	DG/MD/JP/AN/KW litigation team meeting to determine Kellogg positions and personnel to depose; content of 30(b)(1) deposition; content of 30(b)(6) deposition; report status and progress of PLT discovery production; report status and lack of progress in defendant discovery production
12/24/2014	AN	1.1	DG/MD/JP/AN/KW litigation team meeting to determine Kellogg positions and personnel to depose; content of 30(b)(1) deposition; content of 30(b)(6) deposition; report status and progress of PLT discovery production; report status and lack of progress in defendant discovery production
12/24/2014	MD	1.1	DG/MD/JP/AN/KW litigation team meeting to determine Kellogg positions and personnel to depose; content of 30(b)(1) deposition; content of 30(b)(6) deposition; report status and progress of PLT discovery production; report status and lack of progress in defendant discovery production
12/24/2014	KW	0.6	complete draft of Answer to Interrogatories .3 telephone call to plaintiff CC to clarify answers to Interrogatories .2 process mailing of Answer and cover letter to plaintiff .1
12/26/2014	CLER	0.2	File client documents
12/26/2014	AG	1.3	review and organization documents recd from client ([client])
12/26/2014	CLER	0.2	create PDF format of documents recd from client ([client])
12/26/2014	AN	0.1	Telephone call from MG
12/26/2014	CLER	1.9	create PDF format of documents recd from client ([client])
12/26/2014	CLER	0.2	create PDF format of correspondence recd from Atkinson Baker (transcript for deponent to read and sign, [client])
12/26/2014	CLER	0.1	create PDF format of correspondence recd from D. ( follow up of discussion)
12/29/2014	CLER	0.4	revise responses in Answer to Interrogatories Word doc. as directed be email from plaintiff .1 create pdf of revised Answer .1 email to plaintiff R. Dudley for review with explanation and instructions.2
12/29/2014	MD	0.1	md email defense counsel about deposition 0.1
12/29/2014	MD	0.1	md review list of outstanding depositions 0.1
12/29/2014	KW	4.4	for plaintiffs: [client][client][client][client][client][client][client]and[client].-- review documents to be produced; organize electronic files, redact as needed; Bates Stamp, use HighTail to produce to defendant to need demands of defendant add information to spreadsheet to track for each document produced
12/29/2014	KW	0.4	organize scanned documents of plaintiff [client] for production to defendant to comply with discovery demands Redact as needed Bates Stamp-
12/29/2014	KW	0.2	update electronic deposition transcript file and transcript correspondence file
12/29/2014	MD	0.7	md editing 30b6 notice 0.7
12/29/2014	KW	0.1	update electronic file with correspondence regarding PLT objections to questions #13 and 14 in Interrogatories
12/29/2014	MD	0.7	md reviewing discovery request spreadsheet and prioritizing list of needs 0.7
12/29/2014	MD	0.6	md reading/analyzing Kellogg's various motions and letter re meet and confer regarding discovery 0.6
12/29/2014	CLER	0.1	create PDF format of correspondence recd from D. ( follow-up on meet and confer)

Date	Staff	Amount of Time	Description
12/29/2014			organize 1804 pages of scanned documents for production to defendant to comply with discovery demands Redact as needed Bates Stamp- use HighTail to produce to defendant 1.2
	KW	1.2	
12/29/2014	AG	2	organized documents recd from client ([client]) for scanning
12/29/2014	KW	0.3	email correspondence with plaintiff [client] to clarify medical records and secure release to produce to defendant .3
12/29/2014	CLER	0.9	create PDF format of documents recd from client ([client])
12/30/2014	DG	0.1	review email to James Boudreau re extension to motions .1
12/30/2014	JP	0.4	dg/jp discuss def failure to supply TM-CA addresses .4
12/30/2014	AN	0.3	Prepare letter to mail with questions
12/30/2014	DG	1.2	dg/jp discuss def failure to supply TM-CA addresses .4; legal research re same .3; email to James Boudreau re same .5
12/30/2014	AN	0.3	Prepare letter to mail with questions
12/30/2014	MD	0.2	md drafting email to defense counsel about extension of time to respond to motions 0.2
12/30/2014	MD	0.2	md/dg discussing prospects of settlement and how Kellogg makes TMs exempt from OT 0.2
12/30/2014	DG	0.2	md/dg discussing prospects of settlement and how Kellogg makes TMs exempt from OT 0.2
12/30/2014	JS	0.1	call from plt DF asking for update and has questions--sent to JP vm
12/30/2014	MD	0.5	md compile list of outstanding discovery 0.5
12/30/2014	MD	0.3	md compiling list of outstanding discovery 0.3
12/30/2014	MD	0.2	md review Kellogg's responses to Plaintiffs 5 and 6 discovery requests 0.2
12/30/2014	AG	0.2	create fed ex label for client mailing of documents ([client])
12/30/2014	MD	0.2	md search for and review list of variable labor for California opt-ins 0.2
12/30/2014	DG	0.1	md/dg discussing email to send to defense counsel about extension to respond to Kellogg's motion 0.1
12/30/2014	MD	0.1	md/dg discussing email to send to defense counsel about extension to respond to Kellogg's motion 0.1
12/31/2014			telephone call to plaintiff [client] regarding incomplete questions responses to inform Answer to Interrogatories .2 draft explanatory cover letter .1 resend questions, cover letter and return envelope to plaintiff [client] .1 add information to case notes .1
	KW	0.5	
12/31/2014			Search electronic files for defendant document production for Plaintiffs [client] and [client]-.3 email to defense counsel to request production of missing document files .1
	KW	0.4	
12/31/2014			MD/KW review spreadsheet of missing discovery-complete list of discovery requested and not produced by defendant review and discuss proposed list of Kellogg Executives and positions to be deposed determine issues to be decided to finalize deposition list
	MD	0.5	
12/31/2014	KW	0.2	download discovery production .2
12/31/2014			email response to plaintiff K. Pfeffer regarding his questions about completing questions to inform Answer to Interrogatories .2 prepare paper copy of questions and explanatory cover letter to mail to plaintiff with stamped envelope .2
	KW	0.4	
12/31/2014	JS	0.3	called re: questions
12/31/2014			review documents submitted by plaintiff [client] to prepare for production to defendant
	KW	1.8	1.8

Date	Staff	Amount of Time	Description
12/31/2014	KW	0.5	MD/KW review spreadsheet of missing discovery-complete list of discovery requested and not produced by defendant review and discuss proposed list of Kellogg Executives and positions to be deposed determine issues to be decided to finalize deposition list
12/31/2014	KW	0.5	prepare spreadsheet of Discovery missing from defendant's document production-description of request-date requested-status- email explanatory hyperlink to litigation team .1
12/31/2014	KW	0.2	respond to email from plaintiff [client]-regarding need to resend him a link to questions to respond to discovery demanded by defendant .1 email to paralegal JP re need to send new questions link to plaintiff. 1
12/31/2014	MD	2.5	md researching case law re preemption and drafting outline opposing Kellogg's motion 2.5
1/2/2015	CLER	0.1	create PDF format of rogs recd from client ([client])
1/5/2015	CLER	0.2	create PDF format of documents recd from clients ( [client] and [client] TM/RSR questions)
1/5/2015	KW	0.1	MD/KW discuss production of medical records sent by plaintiff [client] .1
1/5/2015	MD	0.1	MD/KW discuss production of medical records sent by plaintiff [client] .1
1/5/2015	CLER	0.4	review medical records to determine which pages should not be produced to defendant .2 create pdf of documents to review for redaction and production .1 update electronic file of client documents .1
1/5/2015	KW	0.4	review documents sent by plaintiff [client] in response to defendant's discovery request .1 redact as needed .2 Bates Stamp for production to defendant .1
1/5/2015	KW	0.2	use HighTail to send Bates stamped documents to defendant .2
1/5/2015	KW	0.6	review handwritten paper questions return use responses to inform and complete Answer to Interrogatories .2 prepare Answer to Interrogatories to be mailed to plaintiff [client] for review .2 process mailing of completed Answer to Interrogatories .1 add information to excel spreadsheet tracking Discovery Responses .1
1/5/2015	JP	0.6	JP/KW review status of responses to defendant's discovery demands; update tracking spreadsheets as needed determine tasks going forward to complete response process
1/5/2015	MD	0.1	md reviewing local rules for motion/stipulation note date 0.1
1/5/2015	CLER	0.7	telephone call to plaintiff [client] to supplement his responses to the questions to inform his Answer to Interrogatories .2 add information to Answer to Interrogatories template .2 create pdf .1 email pdf to plaintiff [client]for his review and approval .1 add explanatory not to electronic file .1
1/5/2015	KW	0.3	prepare printed questions for plaintiff at his request .1 process mailing printed questions, return envelope and letter of instructions to plaintiff [client] .2
1/5/2015	KW	0.4	complete Bates stamping excel spreadsheets for production to defendant .4
1/5/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#291 - STIPULATION AND PROPOSED ORDER for Extension of Time for Plaintiffs to Respond by parties re [289] MOTION for Judgment on the Pleadings , [290] MOTION Strike untimely filed Consents to Sue (Attachments: # (1) Proposed Order)(Dunn, Matt)
1/5/2015	MD	0.2	md email court proposed order for joint motion 0.2
1/5/2015	CLER	0.2	create PDF format of documents recd from client ([client])
1/5/2015	MD	0.3	md call with defense counsel about extension of time to respond to motion 0.3
1/5/2015	CLER	0.1	create PDF format of documents recd from client ([client])

Date	Staff	Amount of Time	Description
1/5/2015	AG	0.2	ECF Filing of STIPULATION AND PROPOSED ORDER for Extension of Time for Plaintiffs to Respond re [289] MOTION for Judgment on the Pleadings , [290] MOTION Strike untimely filed Consents to Sue (Attachments: # (1) Proposed Order)
1/5/2015	KW	0.6	review emails for attorney client communication redact emails which included client attorney communication .6
1/5/2015	DG	0.1	md/dg discussing extension of time to file against Kellogg's motions 0.1
1/5/2015	MD	0.1	md email defense counsel about extension of time 0.1
1/5/2015	MD	0.5	md draft stipulation for extension of time 0.5
1/5/2015	KW	0.6	JP/KW review status of responses to defendant's discovery demands; update tracking spreadsheets as needed determine tasks going forward to complete response process
1/5/2015	MD	0.1	md/dg discussing extension of time to file against Kellogg's motions 0.1
1/5/2015	KW	0.5	review Answer to Interrogatories for 14 plaintiffs; produce to defendant using HighTail
1/5/2015	MD	2	md drafting outline in opposition to Kellogg's motion for judgment on the pleadings 2.0
1/5/2015	KW	0.2	Bates stamp documents to produce to defendant
1/6/2015	KW	0.7	prepare document production to produce 430 excel spreadsheets to defendant in response to Defendants Discovery demands
1/6/2015	KW	0.9	JP/KW paralegal meeting to review status of production of Answers to Interrogatories and determine task assignments going forward; review of Master Spreadsheet of Discovery requests to defendant and defendant document production; identify needs requiring IT specialist to resolve; determine which plaintiffs need an email to complete Answer to Interrogatories
1/6/2015	KW	0.5	review emails, documents and text messages sent by plaintiff [client] in response to defendant's discovery requests .4 save to electronic file in plaintiff's document folder .1
1/6/2015	CLER	0.9	create PDF format of documents recd from client
1/6/2015	KW	0.2	JP/KW confer to track and coordinate Answer to Interrogatories and document Production for plaintiff [client]
1/6/2015	KW	0.2	Produce documents to defendant in response to discovery requests
1/6/2015	CLER	0.2	File client documents
1/6/2015	JP	0.2	JP/KW confer to track and coordinate Answer to Interrogatories and document Production for plaintiff [client]
1/6/2015	KW	0.1	research files to determine status regarding producing Answer to Interrogatories
1/6/2015	KW	0.1	research files to determine status regarding producing Answer to Interrogatories
1/6/2015	MD	0.3	md drafting opposition brief to motion for judgment on the pleadings 0.3
1/6/2015	KW	0.6	answer spouse's questions regarding possible retaliation against her husband for joining.2 Discussion with plaintiff regarding his termination and concern about termination and possible retaliation- .4
1/6/2015	DG	0.1	review emails re scheduled motions .1
1/6/2015	KW	0.1	research files to determine status regarding producing Answer to Interrogatories
1/6/2015	KW	0.1	research files to determine status regarding producing Answer to Interrogatories

Date	Staff	Amount of Time	Description
1/6/2015	KW	0.2	research files to determine status regarding producing Answer to Interrogatories
1/6/2015	MD	0.2	MD/KW review Kellogg claims and position re late filers determine information needed form out files .2
1/6/2015	KW	0.7	Review documents sent by plaintiffs to be produced to satisfy defendant's document requests; update electronic document folders of plaintiffs; review Answer to Interrogatories to be produced to defendant today;
1/6/2015	KW	0.8	review, redact and Bates stamp plaintiff produced documents for production to defendant in response to discovery demands for [client] use High Tail to produce documents to defendant
1/6/2015	KW	0.2	MD/KW review Kellogg claims and position re late filers determine information needed form out files .2
1/6/2015	MR	0.7	prepare document production to produce 430 excel spreadsheets to defendant in response to Defendants Discovery demands
1/6/2015	KW	1.4	research electronic files to identify each opt-in who filed after the deadline date claimed by Kellogg , date of filing CTS, discovery produced by the late filer, discovery produced by defendant for the late filer, number of opt-ins and number of files produced by defendant for opt-ins prepare memo and email to attorney - information needed to respond to defendant's motion to strike opt-ins
1/6/2015	KW	0.3	calculate number of documents produced and number of plaintiffs producing documents to report status of discovery production to litigation team .2 email report to litigation team .1
1/6/2015	JP	0.9	JP/KW paralegal meeting to review status of production of Answers to Interrogatories and determine task assignments going forward; review of Master Spreadsheet of Discovery requests to defendant and defendant document production; identify needs requiring IT specialist to resolve; determine which plaintiffs need an email to complete Answer to Interrogatories
1/7/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#292 - ORDER on STIPULATION [291] for extension of time to reply to [289] MOTION for Judgment on the Pleadings and [290] MOTION Strike untimely filed Consents to Sue ; Plaintiffs' deadline is 1/23/15; Defendant's deadline is 1/30/15; Noting Date has been reset to 1/30/2015. Signed by Judge Ronald B. Leighton. (DN)
1/7/2015	KW	0.4	prepare agenda for litigation team meeting review notes and actions to be taken from previous litigation team meeting circulate and print agenda and previous meeting notes
1/7/2015	KW	0.2	telephone call to plaintiff [client] to pursue completion of questions to inform Answer to Interrogatories .2 add information to case notes .1
1/7/2015	KW	0.1	update numbering on electronic file of produced documents for plaintiff [client] .1
1/7/2015	KW	0.2	Add files to electronic folder of Bates Stamped Produced Documents to reflect latest production
1/7/2015	JP	0.6	JP/KW identify 62 additional plaintiffs' Answers to Interrogatories ready for production to defendant .2 create excel worksheets to track this production .1 identify problem Answers to Interrogatory which need to be resolved with individual plaintiffs prior to production .3

Date	Staff	Amount of Time	Description
1/7/2015	KW	1.3	dg/md/jp/mr/an/kw litigation team meeting: report status and plan action needed regarding: defendants to be deposed; Discovery not produced by defendant; Plaintiffs' responses to defendant's discovery requests; case staffing and retaliation concerns of plaintiff [client]
1/7/2015	CLER	0.3	create PDF format of documents recd from client ([client])
1/7/2015	MD	0.5	md drafting opposition brief regarding judgment on the pleadings 0.5
1/7/2015	KW	0.3	review Bates stamp and produce documents sent by PLT [client] .3
1/7/2015	KW	0.4	research contacts, communication and Answer to Interrogatory production for plaintiffs [client], [client] and [client] to resolve discrepancies in their files
1/7/2015	JP	0.8	jp/kw compose email to be sent to plaintiffs who have not responded to questions and have not produced responses to defendants' discovery demands outline obligations and possible consequences of not responding
1/7/2015	KW	0.6	Produce Answer to Interrogatories for 62 additional plaintiffs .4 update tracking spreadsheet .2
1/7/2015	KW	0.2	produce completed Answer to Interrogatories to defendant for PLT [client]
1/7/2015	MR	0.5	MR/KW review process and tasks to respond to defendant's discovery demands regarding Interrogatories and document production identify glitches in the process brainstorm solutions- identify issues that need immediate attention develop a plan
1/7/2015	MR	0.5	MR/KW review process and tasks to respond to defendant's discovery demands regarding Interrogatories and document production identify glitches in the process brainstorm solutions- identify issues that need immediate attention develop a plan
1/7/2015	MR	2	work on new questionnaire set 568
1/7/2015	DG	0.4	draft emails to James Boudreau re TM-CAs not being included in class list .4
1/7/2015	MD	1.3	dg/md/jp/mr/an/kw litigation team meeting: report status and plan action needed regarding: defendants to be deposed; Discovery not produced by defendant; Plaintiffs' responses to defendant's discovery requests; case staffing and retaliation concerns of plaintiff [client]
1/7/2015	MR	1.3	dg/md/jp/mr/an/kw litigation team meeting: report status and plan action needed regarding: defendants to be deposed; Discovery not produced by defendant; Plaintiffs' responses to defendant's discovery requests; case staffing and retaliation concerns of plaintiff [client]
1/7/2015	KW	0.4	organize information presented by plaintiff [client] concerning his termination nd his concern about retaliation add information to electronic case file
1/7/2015	KW	0.8	jp/kw compose email to be sent to plaintiffs who have not responded to questions and have not produced responses to defendants' discovery demands outline obligations and possible consequences of not responding
1/7/2015	KW	0.5	MR/KW review process and tasks to respond to defendant's discovery demands regarding Interrogatories and document production identify glitches in the process brainstorm solutions- identify issues that need immediate attention develop a plan
1/7/2015	AN	1.3	dg/md/jp/mr/an/kw litigation team meeting: report status and plan action needed regarding: defendants to be deposed; Discovery not produced by defendant; Plaintiffs' responses to defendant's discovery requests; case staffing and retaliation concerns of plaintiff [client]
1/7/2015	DG	1.3	dg/md/jp/mr/an/kw litigation team meeting: report status and plan action needed regarding: defendants to be deposed; Discovery not produced by defendant; Plaintiffs' responses to defendant's discovery requests; case staffing and retaliation concerns of plaintiff [client]



Date	Staff	Amount of Time	Description
1/7/2015	JP	1.3	dg/md/jp/mr/an/kw litigation team meeting: report status and plan action needed regarding: defendants to be deposed; Discovery not produced by defendant; Plaintiffs' responses to defendant's discovery requests; case staffing and retaliation concerns of plaintiff [client]
1/7/2015	KW	0.6	JP/KW identify 62 additional plaintiffs' Answers to Interrogatories ready for production to defendant .2 create excel worksheets to track this production .1 identify problem Answers to Interrogatory which need to be resolved with individual plaintiffs prior to production .3
1/7/2015	KW	0.2	Respond to questions from plaintiff [client] regarding his termination and possible retaliation
1/8/2015	MD	0.2	md coordinate 30b6 ESI deposition 0.2
1/8/2015	KW	1.3	Prepare Answer to Interrogatories for following Plaintiffs to respond to defendant's discovery demands: [client][client][client][client][client][client][client]and[client] Prepare explanatory cover letter for each Process mailing to plaintiffs
1/8/2015	KW	0.5	telephone discussion with plaintiff [client] regarding his termination by Kellogg .4 discussion of need for him to complete questions to inform responses to def. Interrogatories .1
1/8/2015	JP	0.2	JP/KW discuss disposition of boxes of documents sent by plaintiffs determine focus of tasks for the day to advance this litigation
1/8/2015	MD	1	md drafting letter in response to Kellogg regarding motion to compel , including researching cases 1.0
1/8/2015	KW	1.1	prepare second questions for plaintiffs who failed to respond to first questions to provide information to respond to defendants discovery requests prepare explanatory cover letter prepare directions process mailing to : plaintiffs [client][client][client][client][client][client][client][client][client][client][client][client]and[client]
1/8/2015	DG	0.3	draft response to client's wife re suicide of K employee client .3
1/8/2015	KW	0.2	prepare questions and process mailing to plaintiff to inform Answer to Interrogatories
1/8/2015	KW	0.2	JP/KW discuss disposition of boxes of documents sent by plaintiffs determine focus of tasks for the day to advance this litigation
1/8/2015	AN	0.1	File CTS form in file cabinet
1/8/2015	JP	0.1	JP/KW plan mailing Answer to Interrogatories to plaintiffs who do not have access to internet and email
1/8/2015	AN	0.2	Phone call with case update
1/8/2015	KW	0.1	JP/KW plan mailing Answer to Interrogatories to plaintiffs who do not have access to internet and email
1/9/2015	AN	0.1	JLP/AN Discuss return receipt from client [client]
1/9/2015	JP	0.1	JLP/AN Discuss return receipt from client [client]
1/9/2015	AG	0.2	create photo of work pant recd from client ([client])
1/9/2015	AG	0.2	arrange a stenographer (01.14.2015 - Continuation of 30(b)(6))
1/9/2015	CLER	0.2	File client documents
1/9/2015	CLER	0.2	create PDF format of documents recd from client ([client])
1/10/2015	MR	0.6	Talk with Kellogg client about K-related Gmail email messages and how to extract .4, look up Gmail copy operations .1, follow-up with email to JP .1
1/10/2015	MR	1.4	analysis and compilation of damage data from Def in preparation for damage calcs
1/11/2015	MR	2.2	web research on 3 Kellogg ESI deponents 1.0, initial edits to updated ESI deposition outline 1.2

Date	Staff	Amount of Time	Description
1/11/2015	MR	1.3	web research on Kellogg deponent John Whitaker articles about kstars, kronos and related 1.0, send detailed email to attys/paras on deponent .3
1/11/2015	MR	2.1	work on damage calculations
1/12/2015	KW	0.2	telephone call to remind him to complete questions-information needed to complete Defendant's Interrogatories add note in case file
1/12/2015	KW	0.2	review documents provided by plaintiff in response to defendants' discovery demands .2
1/12/2015	KW	0.4	redact and Bates stamp documents for production to defendant- PLT [client] .3 Use Hightail to produce to defendant in response to discovery requests .1
1/12/2015	MR	0.1	md/dg/mr discussing 30b6 ESI topics/issues to cover 0.1(md) 0.2(md/dg)
1/12/2015	KW	0.7	review documents, emails and resume of plaintiff [client] to prepare for production to defendant in response to defendant's discovery demands .3 save documents to pdf to prepare for production .4
1/12/2015	KW	0.2	Bates stamp and produce documents to defendant in response to Discovery requests - [client]
1/12/2015	CLER	0.5	prepare FedEx mailing (returned o[client]. document to client - [client])
1/12/2015	MR	0.7	dg/mr/ md [ part] prep for IT deposition .7
1/12/2015	MD	0.4	dg/mr/ md [ part] prep for IT deposition .4
1/12/2015	KW	0.2	Bates stamp and produce documents to defendant in response to Discovery requests [client]
1/12/2015	DG	0.2	dg/mr discuss schedule for deposition prep .2
1/12/2015	KW	0.2	add Plaintiffs' names and Bates numbers of documents produced to Production Tracking spreadsheet
1/12/2015	CLER	0.1	create PDF format of TM.RSR questions recd from client
1/12/2015	CLER	0.6	prepare FedEx mailing (returned o[client]. document to client - [client])
1/12/2015	KW	0.5	use written answers to questions to complete Answer to Interrogatories .4 mail cover letter and completed Answer to Interrogatories to plaintiff J Lowenthal for his review and approval prior to production defendant .1
1/12/2015	DG	0.2	md/dg/mr discussing 30b6 ESI topics/issues to cover 0.1(md) 0.2(md/dg)
1/12/2015	MD	0.2	md/dg/mr discussing 30b6 ESI topics/issues to cover 0.1(md) 0.2(md/dg)
1/12/2015	MR	0.2	dg/mr discuss schedule for deposition prep .2
1/12/2015	CLER	0.1	create PDF format of document recd from client
1/12/2015	MR	2.4	review many Kellogg documents in preparation for ESI depo
1/12/2015	KW	0.2	Read and add revisions-suggestions to draft discovery letter to be sent to Defendant regarding missing discovery
1/12/2015	DG	0.1	review letter response to K's letter re discovery objections .1
1/12/2015	MR	0.5	MR/KW review- variable labor reports, scorecards and itineraries produced by defendant and by plaintiffs to compare content and identify questions to be asked during deposition to IT person
1/12/2015	DG	0.5	dg/mr/md [part] prepare outline for 30b6 IT deposition continuation .5
1/12/2015	KW	0.3	draft letter to explain returning box of documents to [client].2 draft email re FEDEXing box of documents .1
1/12/2015	KW	0.3	draft letter to explain returning box of documents to plaintiff [client] .2 draft email re FEDEXing box of documents .1
1/12/2015	DG	0.7	dg/mr/ md [ part] prep for IT deposition .7
1/12/2015	MD	0.1	dg/mr/md [part] prepare outline for 30b6 IT deposition continuation .1
1/12/2015	MR	0.5	dg/mr/md [part] prepare outline for 30b6 IT deposition continuation .5
1/12/2015	KW	0.2	Bates stamp and produce documents to defendant in response to Discovery requests - PLT [client]

Date	Staff	Amount of Time	Description
1/12/2015	KW	0.5	MR/KW review- variable labor reports, scorecards and itineraries produced by defendant and by plaintiffs to compare content and identify questions to be asked during deposition to IT person
1/12/2015	MD	0.5	md editing letter to defense counsel about meet and confer on opt-in discovery 0.5
1/12/2015	MD	0.5	md edit letter to defense counsel about outstanding discovery 0.5
1/12/2015	CLER	0.9	create PDF format of documents recd from client ([client])
1/12/2015	KW	0.3	review documents, emails and resume of plaintiff [client] to prepare for production to defendant in response to defendant's discovery demands .3
1/12/2015	KW	0.3	examine Kellogg knee padded pants- produced by plaintiff [client] as evidence of primary job duty not being sales .1 email response to plaintiff [client] email information to litigation team
1/12/2015	KW	0.4	redact and Bates stamp documents for production to defendant- PLT[client] .3 Use Hightail to produce to defendant in response to discovery requests .1
1/13/2015	JP	0.3	JP/KW identify issues to be addressed at IT deposition .2 plan for production of the next set of Answers to Interrogatories .1
1/13/2015	KW	0.4	Compare Itinerary produced by plaintiff [client] with itineraries produced by defendant- Kellogg- 073886 and Kellogg-07450 to identify missing information draft email to litigation team detailing discrepancies and identifying need to get complete accurate data
1/13/2015	KW	0.2	produce Answer to Interrogatories to defendant via HighTail for PLT [client].1 update spreadsheet tracking PLY Response to Defendant's Discovery Requests .1
1/13/2015	MR	0.1	send phone text to atty DG about ESI depo
1/13/2015	KW	0.3	JP/KW identify issues to be addressed at IT deposition .2 plan for production of the next set of Answers to Interrogatories .1
1/13/2015	KW	0.5	review and analyze Itineraries emailed by plaintiff [client] to determine what relevant information they contain and how it applies to the claims in this case .4 email questions to paralegal litigation team .1
1/13/2015	KW	0.4	MR/KW confer to analyze differenced in Itineraries of deponents produced by Kellogg- identify issues to be clarified; questions to be answered at IT deposition scheduled for tomorrow
1/13/2015	DG	0.1	md/mr/dg discussing 30b6 ESI deposition and potential for postponing deposition 0.1
1/13/2015	KW	0.5	use information provided in questions to inform Answer to Interrogatories .2 email pdf of Answer to Interrogatories to plaintiff [client] for review .1 draft cover letter and mail hard copy of Answer to Interrogatories to plaintiff [client] for review an approval prior to production to defendant .2
1/13/2015	KW	0.2	produce Answer to Interrogatories to defendant via HighTail for PLT [client] .1 update spreadsheet tracking PLY Response to Defendant's Discovery Requests .1
1/13/2015	MR	0.4	read email forwarded by atty MD from Def C .1, review deposition and reply to atty MD .3
1/13/2015	KW	0.8	review personnel files produced by defendant to determine what is included in each file analyze telephone records to determine impact of this information of proof issue of hours worked by plaintiffs
1/13/2015	MR	0.2	md/mr discussing 30b6 ESI deposition and exhibits to produce 0.2
1/13/2015	MR	0.1	email revised damage calculations to attys/paras
1/13/2015	MD	0.2	md/mr discussing 30b6 ESI deposition and exhibits to produce 0.2
1/13/2015	MR	4.4	annotate each exhibit for questions for ESI deposition tomorrow

Date	Staff	Amount of Time	Description
1/13/2015	DG	0.1	md/mr/dg discussing 30b6 ESI deposition and potential for postponing deposition 0.1
1/13/2015	MD	0.1	md/mr/dg discussing 30b6 ESI deposition and potential for postponing deposition 0.1
1/13/2015	MD	0.5	md/mr discussing 30b6 ESI deposition and reviewing letter to defense counsel re discovery 0.5
1/13/2015	MR	0.1	md/mr discussing sending exhibits to defense counsel for 30b6 ESI deposition 0.1
1/13/2015	MD	0.3	md coordinating 30b6 ESI deposition 0.3
1/13/2015	MD	0.1	md/mr discussing sending exhibits to defense counsel for 30b6 ESI deposition 0.1
1/13/2015	MR	0.4	MR/KW confer to analyze differenced in Itineraries of deponents produced by Kellogg- identify issues to be clarified; questions to be answered at IT deposition scheduled for tomorrow
1/13/2015	AG	0.1	PCF TSG changed of start time of deposition 30b6
1/13/2015	KW	0.4	organize latest document production from defendant Bates Numbers 83837-91680- add to electronic file
1/13/2015	CLER	0.1	create PDF format of TM/RSR questions recd from client ([client])
1/13/2015	MR	2.5	select various documents for deposition and prepare them to be sent out to Def C.
1/13/2015	KW	0.1	save excel spreadsheets to electronic file to prepare for production to defendant .1
1/13/2015	KW	0.2	KW/AN Review new Def. documents received
1/13/2015	AN	0.2	KW/AN Review new Def. documents received
1/13/2015	KW	0.1	AG/KW review calendars to be produced for plaintiff [client] to respond to defendant's discovery requests to determine best methods to scan and produce
1/13/2015	CLER	2.1	create PDF format of documents recd from client
1/13/2015	JP	0.5	jp/mr discuss Kellogg documents and issues that could be raised in ESI 30b6 depo
1/13/2015	MR	0.1	read and reply to MD's forward of email from Def C about removal of one deponent from scheduled depo
1/13/2015	AG	0.1	AG/KW review calendars to be produced for plaintiff [client] to respond to defendant's discovery requests to determine best methods to scan and produce
1/13/2015	KW	0.7	review documents form PLT [client] to produce to defendant in response to discovery demands .4 convert to pdfs as needed for production to defendant .3
1/13/2015	KW	0.3	review PLT document production- pull sample resumes produced for attorney preparation for conference call with defendant
1/13/2015	MR	0.5	jp/mr discuss Kellogg documents and issues that could be raised in ESI 30b6 depo
1/14/2015	DG	5.2	dg/mr prepare for deposition .7; IT depositions 11 - 4:10 with 45m lunch 4.5
1/14/2015	KW	0.1	email to paralegal AG regarding scanning and returning appointment books sent by plaintiff JD in response to defendant's discovery demands
1/14/2015	KW	0.3	Review documents produced by plaintiff [client]s in response to defendant's discovery demands .2 email to attorney for review prior to production to defendant .1
1/14/2015	CLER	0.9	create PDF format of documents recd from client

Date	Staff	Amount of Time	Description
1/14/2015	KW	0.5	review letter from Zone Manager and Work With Store Recaps for plaintiff B. Wagoner .4 save to proof file as evidence of primary job duty .1
1/14/2015	MR	5.2	dg/mr prepare for deposition .7; IT depositions 11 - 4:10 with 45m lunch 4.5
1/14/2015	KW	0.1	draft cover letter to return 2nd box of documents to plaintiff [client]
1/14/2015	KW	0.1	respond to email from plaintiff [client] regarding decrease in his assigned labor as his budget is increasing
1/14/2015	KW	0.3	review Itinerary produced by [client] for possible evidence of hours worked .2 copy pdf to proof file as evidence of hours worked .1
1/14/2015	MR	0.1	JP/MR discuss email from client about Kellogg call center
1/14/2015	KW	0.6	read emails forwarded by plaintiff [client] in response to defendant's discovery demands .2 Redact as needed .2 print each one to individual pdf .2
1/14/2015	CLER	0.1	create PDF format of TM/RSR questions recd from client (J. Godwin)
1/14/2015	MR	0.2	restart email archive of client Gmail messages (timed-out)
1/14/2015	CLER	0.9	review hard copy of questions completed by plaintiff [client] .1 use responses to prepare Answer to interrogatories .2 create pdf of Answer .1 draft cover explanatory email .2 email explanation and pdf to plaintiff for review .1 add information to case notes .1 update spreadsheet tracking responses of 854 plaintiffs to Defendant's discovery requests .1
1/14/2015	MR	0.2	examine client email regarding call center and reformat html code for readability .1, email to para JP .1
1/14/2015	JP	0.1	JP/MR discuss email from client about Kellogg call center
1/14/2015	KW	2.1	Review, organize, redact, Bates stamp Plaintiffs' documents for production to defendant to satisfy discovery demands: Plaintiffs: [client][client][client][client][client][client]and[client]
1/14/2015	MR	0.1	send email to client that email archiving process was finished and he could change pwd back
1/14/2015	KW	0.2	respond to email from plaintiff [client] regarding increase in budget but decrease in variable labor hours .1 archive emails in electronic case file
1/14/2015	CLER	0.3	prepare mailing to client (returned o[client]. documents [client]) FedEx residential
1/14/2015	CLER	0.2	download and save to electronic file documents produced by plaintiff [client] .2
1/14/2015	MR	0.9	continued work on ESI deposition outline .5, listen to deponent Whitaker webinar re: Kellogg's use of Kronos .4
1/14/2015	JP	0.2	DG/MR/JP/KW confer regarding plaintiffs' expenses, reimbursement and care use policy while working as TMs for Kellogg .2
1/14/2015	DG	0.2	DG/MR/JP/KW confer regarding plaintiffs' expenses, reimbursement and care use policy while working as TMs for Kellogg .2
1/14/2015	MR	0.9	continued work on client Gmail messages: continued monitoring of archive process .2, complete archive process and begin export of messages to external pst file .5, continued monitoring of export process .2
1/14/2015	AG	0.3	create hard copies of exhibit for deposition
1/14/2015	KW	0.2	DG/MR/JP/KW confer regarding plaintiffs' expenses, reimbursement and care use policy while working as TMs for Kellogg .2
1/14/2015	MR	0.5	initiate work on archiving Gmail messages from client
1/14/2015	CLER	0.1	create PDF format of document recd from client ( [client])
1/14/2015	MR	0.2	DG/MR/JP/KW confer regarding plaintiffs' expenses, reimbursement and care use policy while working as TMs for Kellogg .2
1/15/2015	MD	2	md editing response to motion for judgment on the pleading 2.0

Date	Staff	Amount of Time	Description
1/15/2015	KW	0.3	telephone call from plaintiff [client]-concerning problems using questions link to provide information needed to complete Defendant's Interrogatories .1 add information to case notes .1 email information and solution to paralegal supervising questions production and responses .1
1/15/2015	KW	0.6	Review documents sent by plaintiff [client] in response to discovery demands of defendant .2 redact as needed .1 Bates stamp batches of documents for production .2 use HighTail document sharing to produce documents to defendant .1
1/15/2015	CLER	0.3	File client documents in file cabinet
1/15/2015	KW	0.6	Review documents sent by plaintiff [client] in response to discovery demands of defendant .2 redact as needed .1 Bates stamp batches of documents for production .2 use HighTail document sharing to produce documents to defendant .1
1/15/2015	KW	0.1	add information regarding latest document production to spreadsheet tracking responses to defendant's discovery demands
1/15/2015	KW	0.4	produce Answer to Interrogatories for 97 plaintiffs update electronic file of Discovery Demands and Plaintiff responses
1/15/2015	KW	0.4	Review documents sent by plaintiff [client] in response to discovery demands of defendant .2 Bates Stamp for production .1 use HighTail document sharing to produce documents to defendant .1
1/15/2015	CLER	0.2	Transfer documents recd from email system to docket file and create file copy(ROUGH ASCII from deposition of Mr. Dombkiewicz & Mr. Whitaker. readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.)
1/16/2015	CLER	0.1	create PDF format of correspondence recd from D. (meet and confer issues)
1/16/2015	CLER	0.2	File client documents
1/16/2015	CLER	0.3	create PDF format of documents recd from client ([client])
1/19/2015	MD	3	md drafting opposition brief regarding Kellogg motion for judgment on the pleadings 3.0
1/20/2015	MD	0.1	MD/KW discuss determination of which plaintiffs worked in AZ
1/20/2015	KW	0.2	review package of documents sent by plaintiff [client] in response to defendant's discovery demands to prepare for production .2
1/20/2015	KW	0.4	for plaintiffs: [client][client][client][client]-review documents sent to respond ot defendant's discovery demands- prepare for production to defendant
1/20/2015	MD	2	md drafting opposition to Arizona 2.0
1/20/2015	KW	0.1	MD/KW review and discuss documents sent by plaintiff [client] to determine which should be produced and which need clarification to determine if they should be produced
1/20/2015	KW	0.8	download personnel file produced by defendant .4 organize files and add information to discovery tracking spreadsheet .2 identify missing Bates Numbers .1 email information regarding production and missing documents to attorney .1
1/20/2015	KW	0.2	use Time Matters to review current plaintiffs client list .1 add information to Client tracking spreadsheet .1
1/20/2015	KW	0.4	download personnel files produced by defendant .2 organize and add ot electronic file .1 update spreadsheet tracking defendant's discovery production .1
1/20/2015	KW	0.1	MD/KW discuss determination of which plaintiffs worked in AZ
1/20/2015	KW	0.3	sort Excel list of plaintiffs into state categories .1 determine plaintiffs from AZ email spreadsheet of Arizona plaintiffs to attorney at his request



Date	Staff	Amount of Time	Description
1/20/2015	KW	0.4	telephone call to FEDEX to reroute delivery of a box of plaintiffs' documents .2 email to plaintiff [client] regarding delivery of documents to his home address .1 add information to case notes .1
1/20/2015	KW	0.2	KW/AN Discuss process for gaining access to zipped files
1/20/2015	MR	0.2	md/mr discussing 30b6 ESI deposition testimony and follow up with defense counsel about an additional deponent 0.2
1/20/2015	MD	0.2	md/mr discussing 30b6 ESI deposition testimony and follow up with defense counsel about an additional deponent 0.2
1/21/2015	DG	0.2	print out draft response and K's motions (AZ, dism opts, extra depositions) to work on tonight at home .2
1/21/2015	MD	3	md drafting motion opposing Kellogg motion to strike opt-ins 3.0
1/21/2015	MA	0.4	creating list of late consent filings for MD
1/21/2015	MD	0.2	MD/KW research exact wording of what plaintiffs swore to in completing questions to respond to defendant's challenge to Answer to Interrogatories.1 determine information needed for filing brief to respond to defendant's challenge to late filers .1
1/21/2015	MD	2	md editing opposition motion regarding motion for judgment on the pleadings 2.0
1/21/2015	AN	0.6	DG/MD/JP/AN/MR/KW litigation team meeting- to review results of IT depositions, to determine IT information still needed; to review Morning Foods damages calculations and determine needs and next steps to submit calculations to defendant
1/21/2015	JP	0.6	DG/MD/JP/AN/MR/KW litigation team meeting- to review results of IT depositions, to determine IT information still needed; to review Morning Foods damages calculations and determine needs and next steps to submit calculations to defendant
1/21/2015	DG	0.6	DG/MD/JP/AN/MR/KW litigation team meeting- to review results of IT depositions, to determine IT information still needed; to review Morning Foods damages calculations and determine needs and next steps to submit calculations to defendant
1/21/2015	MD	0.6	DG/MD/JP/AN/MR/KW litigation team meeting- to review results of IT depositions, to determine IT information still needed; to review Morning Foods damages calculations and determine needs and next steps to submit calculations to defendant
1/21/2015	MR	0.6	DG/MD/JP/AN/MR/KW litigation team meeting- to review results of IT depositions, to determine IT information still needed; to review Morning Foods damages calculations and determine needs and next steps to submit calculations to defendant
1/21/2015	KW	0.5	pull and print calendars for attorneys for February and March to plan deposition schedule .2 create and print list and chart of Kellogg Deposition O[client]organizing document--topics, potential deponents, position, topic .3
1/21/2015	KW	0.2	MD/KW research exact wording of what plaintiffs swore to in completing questions to respond to defendant's challenge to Answer to Interrogatories.1 determine information needed for filing brief to respond to defendant's challenge to late filers .1
1/21/2015	MD	0.6	DG/MD/JP/AN/KW litigation team meeting to determine response to Defendant's Exclusion list, review current status of PLT discovery response, determine work to be pursued in responding to discovery demands, determine deposition schedule

Date	Staff	Amount of Time	Description
1/21/2015	JP	0.6	DG/MD/JP/AN/KW litigation team meeting to determine response to Defendant's Exclusion list, review current status of PLT discovery response, determine work to be pursued in responding to discovery demands, determine deposition schedule
1/21/2015	KW	0.6	DG/MD/JP/AN/MR/KW litigation team meeting- to review results of IT depositions, to determine IT information still needed; to review Morning Foods damages calculations and determine needs and next steps to submit calculations to defendant
1/21/2015	DG	0.6	DG/MD/JP/AN/KW litigation team meeting to determine response to Defendant's Exclusion list, review current status of PLT discovery response, determine work to be pursued in responding to discovery demands, determine deposition schedule
1/21/2015	AN	0.6	DG/MD/JP/AN/KW litigation team meeting to determine response to Defendant's Exclusion list, review current status of PLT discovery response, determine work to be pursued in responding to discovery demands, determine deposition schedule
1/21/2015	DG	2.5	edit response to def FLSA preemption opposition 1 hr edit; .5 research re same (1.5); edit response re motion to strike late opt ins 1
1/21/2015	KW	0.6	DG/MD/JP/AN/KW litigation team meeting to determine response to Defendant's Exclusion list, review current status of PLT discovery response, determine work to be pursued in responding to discovery demands, determine deposition schedule
1/21/2015	MD	0.1	md/dg discussing depositions/discovery of Kellogg 0.1
1/22/2015	MD	0.3	md/dg call with defense counsel about outstanding discovery issues and extension of discovery deadlines 0.3
1/22/2015	DG	0.3	md/dg call with defense counsel about outstanding discovery issues and extension of discovery deadlines 0.3
1/22/2015	MD	2.5	md editing response to Kellogg's motion for judgment on the pleadings 2.5
1/22/2015	MD	0.3	md/dg discussing arguments to make in motions opposing Kellogg's motion for judgment on the pleadings and dismissing late filings 0.3
1/22/2015	CLER	0	create PDF format of documents recd from client ([client])
1/22/2015	DG	0.1	review damage calcs for morning foods .1
1/22/2015	DG	0.3	further briefing re acceptance of late optins .3;
1/22/2015	DG	0.3	md/dg discussing arguments to make in motions opposing Kellogg's motion for judgment on the pleadings and dismissing late filings 0.3
1/22/2015	MD	1.5	md editing opposition brief to strike late filers 1.5
1/22/2015	MA	0.2	call from FedEx re: mailing docs to opt-in SW
1/23/2015	JS	1.3	format briefs with footer and calif numbering
1/23/2015	AG	0.1	emailed client (FedEx Label for mailing of documents, [client])
1/23/2015	MD	1.5	md editing brief re late opt-ins to prepare for filing 1.5
1/23/2015	MD	0.3	md/mr discussing damage calculations to send to defense counsel 0.3
1/23/2015	MR	0.3	md/mr discussing damage calculations to send to defense counsel 0.3
1/23/2015	CLER	0.2	prepare FedEx Label for client (mailing of documents, [client])
1/23/2015	JS	0.2	MD/JS/AN Discuss preparation of briefs
1/23/2015	MD	0.2	MD/JS/AN Discuss preparation of briefs
1/23/2015	AN	0.2	MD/JS/AN Discuss preparation of briefs
1/23/2015	MD	0.5	md finalizing brief for filing opposition against judgment on the pleading 0.5
1/23/2015	DG	0.8	edit brief in opposition to preemption .4; edit brief in opposition to striking opt ins .4

Date	Staff	Amount of Time	Description
1/23/2015	AG	0.1	ECF Filing of RESPONSE in Opposition to [290] MOTION Strike untimely filed Consents to Sue
1/23/2015	MD	0.1	md review discovery extension motion from defense counsel 0.1
1/23/2015	MD	0.6	md prepare schedule for depositions 0.6
1/23/2015	MA	0.2	filing preemptive brief
1/23/2015	MA	0.6	editing preemptive brief
1/23/2015	MA	0.8	editing response regarding the late opt-ins in preparation for filing
1/23/2015	JS	0.5	format draft opp brief with Calif. numbered pleading format per MD
1/23/2015	JS	0.4	format P opp strike late opt-ins with calif. pleading per MD
1/26/2015	CLER	0.2	create PDF format of TM/RSR questions recd from clients ( [client][client]and[client])
1/26/2015	CLER	0.2	create PDF format of documents recd from client ([client])
1/26/2015	DG	0.1	REVIEW damage calcs for morning foods settlement .1
1/26/2015	CLER	0.1	create PDF format of documents recd from client ([client])
1/26/2015	KW	0.4	use completed questions forms submitted by plaintiffs [client] and [client] to begin preparing Answer to Interrogatories
1/26/2015	KW	0.4	review minutes of previous litigation team meeting- .1 circulate "to dos" to team members .1 review litigation needs to add items to agenda for litigation team meeting scheduled for Wed. 1-28-15 .1 circulate agenda to team for additions .1
1/26/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#293 - RESPONSE, by Plaintiff Patty Thomas, to [290] MOTION Strike untimely filed Consents to Sue . (Dunn, Matt)
1/26/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#294 - RESPONSE, by Plaintiff Patty Thomas, to [289] MOTION for Judgment on the Pleadings . (Dunn, Matt)
1/26/2015	KW	0.4	telephone call from plaintiff regarding documents he has sent .1 discussion of case progress and his responsibilities as a deponent .2 add information to case notes .1
1/26/2015	KW	0.1	jp/kw review status of responses to defendants' discovery requests .1
1/26/2015	DG	0.5	md/dg discussing deposition schedule and availability 0.5
1/26/2015	MD	0.5	md/dg discussing deposition schedule and availability 0.5
1/26/2015	KW	0.1	JP/KW review questionnaire responses to determine status of response by plaintiff [client]
1/26/2015	KW	0.4	research spreadsheets and electronic files to determine status of Answer to Interrogatories for plaintiff [client] .2 determine responses needed .1 email information to JP-paralegal dealing with electronic questions responses .1
1/26/2015	KW	0.4	telephone call to follow-up on plaintiff [client] questions about responding to defendant's discovery requests .1 email to confirm completion of Answer to Interrogatories and to outline need for document production .2 add information to case notes .1
1/26/2015	KW	0.4	review documents sent by plaintiffs in response to defendant's discovery demands prior to production .4
1/27/2015	MD	0.1	md/jp discussing deponents and deposition schedule 0.1
1/27/2015	MD	0.5	md editing request for extension of time 0.5
1/27/2015	MD	0.3	md call with defense counsel about discovery and extension of deadlines 0.3
1/27/2015	JP	0.1	md/jp discussing deponents and deposition schedule 0.1
1/27/2015	KW	0.1	download defendant's document production

Date	Staff	Amount of Time	Description
1/27/2015	KW	0.6	Download 18 personnel files produced by defendant organize and add to electronic file add Information to spreadsheet tracking defendant document production review documents for responsiveness to requests
1/27/2015	KW	0.1	md/kw discussing deposition dates of Kellogg deponents 0.1
1/27/2015	MD	0.1	md/kw discuss need for telephone records being produced by defendant .1
1/27/2015	KW	0.1	update agenda for litigation team meeting scheduled for tomorrow
1/27/2015	KW	2.3	Review, redact as needed, Bates Stamp and produce plaintiff documents for Plaintiffs [client][client][client][client][client][client] and [client] in response to defendant's discovery demands
1/27/2015	MD	0.1	md/kw discussing deposition dates of Kellogg deponents 0.1
1/27/2015	MD	0.3	md editing letter to defense counsel about outstanding discovery 0.3
1/27/2015	MD	0.2	MD/KW review list of Kellogg persons to be deposed .1 Review latest document production to determine responsiveness .1
1/27/2015	KW	0.3	update spreadsheet tracking depositions of defendants- add proposed deposition dates and date of notification to defendant .2 email hyperlink of completed spreadsheet to litigation team .1
1/27/2015	KW	0.1	md/kw discuss need for telephone records being produced by defendant .1
1/27/2015	MD	0.2	md read defense counsel's draft motion for 50 additional depositions 0.2
1/27/2015	KW	0.2	review spreadsheet tracking proposed and noticed depositions of defendants .1 draft email to litigation team regarding defendant depositions noticed and tasks to be completed .1
1/27/2015	CLER	0.2	Transfer documents recd from email system to docket file and create file copy(FINAL ASCIIs from the 1-14-2015 depositions of Mr. Dombkiewicz & Mr. Whitaker.compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript versions of the transcript)
1/27/2015	KW	0.2	MD/KW review list of Kellogg persons to be deposed .1 Review latest document production to determine responsiveness .1
1/27/2015	CLER	0.1	rescan documents for increases readability by defendant in preparation for Production .1
1/27/2015	MD	0.3	md reviewing and editing damage calculations/summary 0.3
1/27/2015	KW	0.4	read emails and draft motion from defendant regarding taking up to 50 additional depositions from plaintiffs .2 review, organize and update spreadsheet to track plaintiff depositions adding information related to new proposed plaintiff depositions .2
1/27/2015	DG	0.2	edit stipulationfor extension .2
1/27/2015	MD	0.2	md reviewing dg edits and send edited stipulation for extension of time to defense counsel 0.2
1/28/2015	KW	1	read deposition transcript testimony to create digest of testimony related to hours worked .8 prepare memo for litigation team .2
1/28/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#295 - NOTICE of Filing of Consent to Sues ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue, # (2) Consent to Sue)(Dunn, Matt)
1/28/2015	MD	0.3	MD/KW review agenda for litigation team meeting .1 discuss case staffing needs .1 review deposition spreadsheet to identify depositions to be planned .1
1/28/2015	MD	0.4	md/mr/kw examine and analyze telephone records being produced for claimants by defendant; determine information presented; format of records and potential usefulness of phone records determine information needed from defendant regarding content of phone records

Date	Staff	Amount of Time	Description
1/28/2015	MR	0.4	md/mr/kw examine and analyze telephone records being produced for claimants by defendant; determine information presented; format of records and potential usefulness of phone records determine information needed from defendant regarding content of phone records
1/28/2015	KW	0.4	JP/KW review documents from plaintiffs [client] and [client] to determine responsiveness to Interrogatories, applicability to proof Chart issues .3 review process for pulling individual plaintiff information from questionnaire results in order to inform stipulation about how many hours plaintiff worked .1
1/28/2015	CLER	0.2	prepare welcome ltr to new client
1/28/2015	MD	0.3	md review damages and draft email to defense counsel about damages for settlement purposes and send to defense counsel 0.3
1/28/2015	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
1/28/2015	CLER	0.1	Data Entry of contact information of client
1/28/2015	KW	1.1	review, Bates Stamp and prepare for production plaintiff documents for the following plaintiffs to respond to defendant's discovery demands: [client][client][client][client][client][client][client]
1/28/2015	MR	0.2	md/mr discussing edits to damage summary/calculations 0.2
1/28/2015	MD	0.2	md/mr discussing edits to damage summary/calculations 0.2
1/28/2015	DG	0.2	review defs' draft motion re additional optins .2
1/28/2015	KW	0.3	Prepare agenda, spreadsheets and information packets for use by litigation team at team meeting .3
1/28/2015	MD	0.2	md drafting email about damage calculations 0.2
1/28/2015	MD	0.1	md email dg about speaking with defense counsel about additional opt-in depositions 0.1
1/28/2015	KW	0.4	Redact and Bates Stamp documents from plaintiff [client]n for production to defendant in response to discovery requests .4
1/28/2015	KW	0.2	research and print sets of Initial Disclosures and Amended Initial Disclosures for litigation team meeting to determine future depositions
1/28/2015	KW	0.7	dg/md/mr/jp/kw litigation team meeting-Determine response to Def. challenge to Answers to Interrogatories; action regarding filing late consents; sending calculation to defendant for Morning Foods Employees; Defendant's suggestion that we stipulate hours worked for claimants, update regarding depositions planned
1/28/2015	KW	0.7	transcribe notes from litigation team meeting .2 circulate to all team members .1 determine "To Dos" for each team member .1 post on Time Matters To Do .1
1/28/2015	CLER	0.2	prepare welcome ltr to new client
1/28/2015	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
1/28/2015	JP	0.2	MR/JP/KW work on automatically identifying the author of a document when the document is highlighted to inform deposition exhibit identification process
1/28/2015	CLER	0.1	Data Entry of contact information of client
1/28/2015	MR	0.2	MR/JP/KW work on automatically identifying the author of a document when the document is highlighted to inform deposition exhibit identification process
1/28/2015	DG	0.1	edit cover letter to MF settlement numbers .1
1/28/2015	KW	0.2	MR/JP/KW work on automatically identifying the author of a document when the document is highlighted to inform deposition exhibit identification process

Date	Staff	Amount of Time	Description
1/28/2015	KW	0.5	read deposition transcript to pull out testimony about hours worked .4 add information to Memo detailing testimony .1
1/28/2015	KW	0.5	read deposition transcript to create a digest of testimony related to hours worked while in Morning Foods and in Snacks add information to Fact Sheet detailing testimony related to hours
1/28/2015	KW	0.3	MD/KW review agenda for litigation team meeting .1 discuss case staffing needs .1 review deposition spreadsheet to identify depositions to be planned .1
1/28/2015	AG	0.2	ECF Filing of NOTICE of Filing of Consent to Sues (Attachments: # (1) Consent to Sue, # (2) Consent to Sue)
1/28/2015	JP	0.7	dg/md/mr/jp/kw litigation team meeting-Determine response to Def. challenge to Answers to Interrogatories; action regarding filing late consents; sending calculation to defendant for Morning Foods Employees; Defendant's suggestion that we stipulate hours worked for claimants, update regarding depositions planned
1/28/2015	DG	0.7	dg/md/mr/jp/kw litigation team meeting-Determine response to Def. challenge to Answers to Interrogatories; action regarding filing late consents; sending calculation to defendant for Morning Foods Employees; Defendant's suggestion that we stipulate hours worked for claimants, update regarding depositions planned
1/28/2015	MD	0.7	dg/md/mr/jp/kw litigation team meeting-Determine response to Def. challenge to Answers to Interrogatories; action regarding filing late consents; sending calculation to defendant for Morning Foods Employees; Defendant's suggestion that we stipulate hours worked for claimants, update regarding depositions planned
1/28/2015	KW	0.4	md/mr/kw examine and analyze telephone records being produced for claimants by defendant; determine information presented; format of records and potential usefulness of phone records determine information needed from defendant regarding content of phone records
1/28/2015	MR	0.7	dg/md/mr/jp/kw litigation team meeting-Determine response to Def. challenge to Answers to Interrogatories; action regarding filing late consents; sending calculation to defendant for Morning Foods Employees; Defendant's suggestion that we stipulate hours worked for claimants, update regarding depositions planned
1/29/2015	DG	0.1	md/dg discussing response to Kellogg concerning stipulation regarding extension of time to complete discovery 0.1
1/29/2015	KW	0.3	Use HighTail document sharing website to send documents of the following plaintiffs: [client][client][client][client][client][client][client][client][client]
1/29/2015	KW	0.6	telephone call from plaintiff [client] regarding his hours and lack of overtime pay as a TSR for Kellogg- discussion of the negative impact of the Kellogg car policy
1/29/2015	MD	0.2	md/dg discussing conversation to have with defense counsel about additional deposition 0.2
1/29/2015	KW	0.3	prepare pdf of Answer to Interrogatories to email to plaintiff KP .2 email with explanation of need to review and approve .1
1/29/2015	KW	0.5	use questions responses to prepare Answer to Interrogatories for plaintiff [client] .3 print Answer to Interrogatories, cover letter to be sent to plaintiff for review. .1 process mailing .1
1/29/2015	MD	0.3	md reviewing edits to stipulation regarding extension of time 0.3



Date	Staff	Amount of Time	Description
1/29/2015	MD	0.2	md/kw discuss PLT responses to defendant's discovery requests detailing number of responses, responses in process and responses needed .2
1/29/2015	DG	0.2	md/dg discussing conversation to have with defense counsel about additional deposition 0.2
1/29/2015	JP	0.2	JLP/AN Discuss anticipated paralegal schedule regarding Kellogg case
1/29/2015	KW	0.6	Research data to determine how many Answers to Interrogatories have been produced and how many are in process .1 Determine how many PLT documents have ben produced .2 add plaintiff discovery information to discovery tracking spreadsheet .3
1/29/2015	MD	0.2	md edit review and stipulation re extension of time and send to defense counsel
1/29/2015	KW	0.4	review and redact documents from plaintiff [client] in preparation for production to defendant in response to defendant's discovery demands .3 Bates stamp documents of plaintiff [client]
1/29/2015	KW	0.4	use questions results to prepare Answer to interrogatories for review by plaintiff prior to Production to defendant .4
1/29/2015	KW	0.3	md/kw review plaintiffs' discovery response members .2 review response to defendant regarding Answers to Interrogatories .1
1/29/2015	KW	0.2	respond to message from plaintiff [client] .1 add information to case notes .1
1/29/2015	KW	0.3	review documents of plaintiff [client] for production to defendant in response to defendant's discovery demands .2 Bates stamp documents .1
1/29/2015	AN	0.2	JLP/AN Discuss anticipated paralegal schedule regarding Kellogg case
1/29/2015	MD	0.1	md draft email to defense counsel about stipulation 0.1
1/29/2015	MD	0.1	md/dg discussing response to Kellogg concerning stipulation regarding extension of time to complete discovery 0.1
1/29/2015	KW	0.4	organize information presented by plaintiff [client] .1 add to case notes .1 draft information memo to litigation team .2
1/29/2015	KW	0.4	download and organize document production from defendant .2 review documents and send email regarding contents to attorney .2
1/29/2015	KW	0.2	scan correspondence from plaintiff explaining why his Consent was submitted after the deadline .1 update electronic file of plaintiff documents .1
1/30/2015	JS	0.5	call for update
1/30/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#296 - Stipulated MOTION for Extension of Time to Complete Discovery by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1) Proposed Order) Noting Date 1/29/2015, (Nelson, James)
2/3/2015	KW	0.6	download files produced by defendant .2 organize and number defendant produced folders .2 update electronic file of documents produced by defendant .1 add information to spreadsheet tracking responses to discovery requests .1
2/3/2015	KW	0.1	process mailing Answer to Interrogatories to plaintiff [client] for his review and signature prior to Production to defendant
2/3/2015	KW	0.1	review plaintiff [client]'s Answer to Interrogatories .1
2/3/2015	KW	0.2	prepare pdf of signed Answer to Interrogatories for production to defendant .2
2/4/2015	KW	0.6	complete Answer to Interrogatories for plaintiff [client] to review .4 draft email regarding documents plaintiff Hill needs to produce and review of Answer to Interrogatories .1 email explanation and pdf of Answer to PLT [client].1
2/4/2015	KW	0.1	MD/KW discuss recent Kellogg discovery production, and the need for production of files to be in native format so we can use it

Date	Staff	Amount of Time	Description
2/4/2015	MD	0.4	md call with defense counsel about discovery issues 0.4
2/4/2015	MR	0.3	transfer pst file of client emails from lab computer to server .2, email to paras about file .1
2/4/2015	MD	0.1	MD/KW discuss recent Kellogg discovery production, and the need for production of files to be in native format so we can use it
2/4/2015	KW	1.3	download personnel files produced by defendant .3 review files to determine contents .8 organize information in electronic file .2
2/5/2015	AN	0.9	DG/MD/MR/AN/KW Kellogg litigation team meeting-determine action needed to compel discovery-time to do what is needed to file Motion to Compel- schedule depositions- planning scheduling for maximum effectiveness
2/5/2015	DG	0.9	DG/MD/MR/AN/KW Kellogg litigation team meeting-determine action needed to compel discovery-time to do what is needed to file Motion to Compel- schedule depositions- planning scheduling for maximum effectiveness
2/5/2015	MD	0.9	DG/MD/MR/AN/KW Kellogg litigation team meeting-determine action needed to compel discovery-time to do what is needed to file Motion to Compel- schedule depositions- planning scheduling for maximum effectiveness
2/5/2015	JP	0.9	DG/MD/MR/AN/KW Kellogg litigation team meeting-determine action needed to compel discovery-time to do what is needed to file Motion to Compel- schedule depositions- planning scheduling for maximum effectiveness
2/5/2015	MR	0.9	DG/MD/MR/AN/KW Kellogg litigation team meeting-determine action needed to compel discovery-time to do what is needed to file Motion to Compel- schedule depositions- planning scheduling for maximum effectiveness
2/5/2015	DG	0.6	md/dg call with defense counsel about outstanding discovery issues 0.6
2/5/2015	DG	0.6	legal research on ability to speak w former Ees under WA ethical rules .4; review of James Boudreau's TM-CA explanation .2
2/5/2015	MD	0.6	md/dg call with defense counsel about outstanding discovery issues 0.6
2/5/2015	KW	0.3	MR/KW research defendant's production of telephone bills for plaintiffs to determine information included, impact on litigation claims and possibility of data being produced in native format
2/5/2015	MR	0.3	MR/KW research defendant's production of telephone bills for plaintiffs to determine information included, impact on litigation claims and possibility of data being produced in native format
2/5/2015	KW	0.3	research discovery produced by defendant for an example of "Expense Data" produced .2 email hyperlink to litigation team .1
2/5/2015	KW	0.9	DG/MD/MR/AN/KW Kellogg litigation team meeting-determine action needed to compel discovery-time to do what is needed to file Motion to Compel- schedule depositions- planning scheduling for maximum effectiveness
2/5/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#298 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [289] MOTION for Judgment on the Pleadings (Attachments: # (1) Declaration of James M. Nelson, # (2) Request for Judicial Notice)(Nelson, James)
2/5/2015	KW	0.2	telephone call to named plaintiff [client] to schedule fact finding interview .1 email information to attorney .1
2/5/2015	KW	0.4	Produce Answers to Interrogatories to defendant in response to discovery demands
2/5/2015	KW	0.5	use hand written questions answers to complete Answers to Interrogatories-.4 add information to case notes .1
2/6/2015	CLER	0.5	File client documents

Date	Staff	Amount of Time	Description
2/6/2015	MR	0.1	read and reply to DG email about docs that Def sent about customer agreements
2/6/2015	MD	0.2	md/ms discussing outside sales exemption and use of service agreements to establish/rebut exemption 0.2
2/6/2015	MS	0.2	md/ms discussing outside sales exemption and use of service agreements to establish/rebut exemption 0.2
2/8/2015	MR	9.1	continued review of deposition testimony and commentary regarding Kellogg responses to 6th doc req in preparation for meet and confer and mot to compel
2/9/2015	CLER	0.1	create PDF format of correspondence recd from Atkinson Baker ( [client] deposition ltr)
2/9/2015	CLER	0.2	create PDF format of documents recd from clients (TM/RSR questions - [client] and [client])
2/9/2015	MR	0.6	continued work on doc req commentary .5, email to attys/para .1
2/9/2015			Transfer documents recd from ECF system to docket file and create file copy(Docket#299 - RDER on STIPULATION [296] for Extension of Time to Complete Discovery; Discovery to be completed by 6/8/2015; signed by Judge Ronald B. Leighton. (DN)
	CLER	0.1	
2/10/2015	MR	0.1	examine Def ltr regarding ESI protocol
2/10/2015	MR	0.1	examine Def handheld sync spreadsheets
2/10/2015	MD	0.5	md/mr discuss arguments for production of documents in response to fifth and sixth discovery demands 0.5
2/10/2015			Transfer documents recd from ECF system to docket file and create file copy(Docket#300 - Second MOTION Additional Depositions from Representative Sample of Plaintiffs by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Declaration of James M. Nelson, # (2) Request for Judicial Notice, # (3) Proposed Order Proposed Order Granting Defendants' Motion to Authorize Additional Depositions) Noting Date 2/27/2015, (Nelson, James)
	CLER	0.1	
2/10/2015	KW	2.8	download defendant's document production review documents produced organize information produced add information to Defendant's Production Tracking Spreadsheet email summary of discovery produced to litigation team
2/10/2015	MR	1.5	md/mr meet and confer with defense counsel about outstanding discovery requests 1.5
2/10/2015	MR	0.5	md/mr discuss arguments for production of documents in response to fifth and sixth discovery demands 0.5
2/10/2015	MD	1.5	md/mr meet and confer with defense counsel about outstanding discovery requests 1.5
2/10/2015	KW	0.4	download document production to defendant .4
2/11/2015	KW	0.4	Review Docket Numbers 238, 276, 299 to determine accurate Discovery Deadlines to update litigation team calendar
2/11/2015			Draft letter to those defendant claims are outside the SOL for this case update annotations of Defendant's list of claimed Exclusions Draft letter to those plaintiffs defendant claims did not work in the class definitions draft memo to litigation team regarding Exclusion List circulate draft letters to litigation team for review and revision
	KW	0.9	
2/11/2015	KW	0.4	complete minutes and tasks determined at litigation team meeting .3 email to litigation team .1
2/11/2015	MD	0.1	MD/KW review need to update Kellogg Calendar deadlines .1
2/11/2015	KW	0.5	prepare and produce Answer to Interrogatories for plaintiffs [client][client][client][client] and [client] .5

Date	Staff	Amount of Time	Description
2/11/2015	KW	0.1	MD/KW review need to update Kellogg Calendar deadlines .1
2/11/2015	MD	0.4	MD/KW review status of responding to defendant's discovery demands determine information needed regarding document production of plaintiffs discuss staffing of this case
2/11/2015	KW	0.2	telephone call to plaintiff to schedule fact finding interview regarding safety training modules .1 add information to case notes .1
2/11/2015	KW	0.8	Review Answers to Interrogatories produced to determine which plaintiffs indicated they have documents but have not produced them .8
2/11/2015	MD	0.2	md draft deposition notice re Randy Nilles 0.2
2/11/2015	AG	0.2	Arrange Court reporter for R. Nilles' deposition on Thursday, February 19, 2015 in Battle Creek, Michigan
2/11/2015	KW	0.4	MD/KW review status of responding to defendant's discovery demands determine information needed regarding document production of plaintiffs discuss staffing of this case
2/11/2015	MD	0.8	DG/MD/JP/MR/AN/KW Litigation team meeting: determine deposition topics and documents needed for Nilles deposition; review results of Meet and Confer with defense counsel; discuss follow-up conference with defense counsel scheduled for tomorrow; detail response needed to Def. motion for 50 additional depositions; need to file motion to court re California TMs inclusion in this class
2/11/2015	JP	0.8	DG/MD/JP/MR/AN/KW Litigation team meeting: determine deposition topics and documents needed for Nilles deposition; review results of Meet and Confer with defense counsel; discuss follow-up conference with defense counsel scheduled for tomorrow; detail response needed to Def. motion for 50 additional depositions; need to file motion to court re California TMs inclusion in this class
2/11/2015	AN	0.8	DG/MD/JP/MR/AN/KW Litigation team meeting: determine deposition topics and documents needed for Nilles deposition; review results of Meet and Confer with defense counsel; discuss follow-up conference with defense counsel scheduled for tomorrow; detail response needed to Def. motion for 50 additional depositions; need to file motion to court re California TMs inclusion in this class
2/11/2015	DG	0.8	DG/MD/JP/MR/AN/KW Litigation team meeting: determine deposition topics and documents needed for Nilles deposition; review results of Meet and Confer with defense counsel; discuss follow-up conference with defense counsel scheduled for tomorrow; detail response needed to Def. motion for 50 additional depositions; need to file motion to court re California TMs inclusion in this class
2/11/2015	KW	0.2	fact finding interview with plaintiff regarding safety training email information to litigation team
2/11/2015	MR	0.8	DG/MD/JP/MR/AN/KW Litigation team meeting: determine deposition topics and documents needed for Nilles deposition; review results of Meet and Confer with defense counsel; discuss follow-up conference with defense counsel scheduled for tomorrow; detail response needed to Def. motion for 50 additional depositions; need to file motion to court re California TMs inclusion in this class
2/11/2015	KW	0.1	MD/KW review and discuss discrepancies in deadlines ordered in docket .1

Date	Staff	Amount of Time	Description
2/11/2015	KW	0.8	DG/MD/JP/MR/AN/KW Litigation team meeting: determine deposition topics and documents needed for Nilles deposition; review results of Meet and Confer with defense counsel; discuss follow-up conference with defense counsel scheduled for tomorrow; detail response needed to Def. motion for 50 additional depositions; need to file motion to court re California TMs inclusion in this class
2/11/2015	KW	0.2	fact finding interview with plaintiff regarding safety training email information to litigation team
2/11/2015	KW	0.2	prepare agenda for litigation team meeting circulate to litigation team
2/11/2015	KW	0.3	MR/KW review chart sent by plaintiff [client] concerning completion of safety module trainings
2/11/2015	MD	0.1	MD/KW review and discuss discrepancies in deadlines ordered in docket .1
2/11/2015	KW	0.2	email response to plaintiff [client] regarding safety training information save information into electronic file
2/11/2015	MR	0.3	MR/KW review chart sent by plaintiff [client] concerning completion of safety module trainings
2/11/2015	KW	0.2	telephone call to plaintiff [client] regarding titles of safety training videos .2
2/11/2015	DG	0.1	email self 30b6 notice to edit .1
2/11/2015	DG	0.7	edit to 30b6 deposition notice .7
2/11/2015	KW	0.2	draft email to plaintiffs currently employed at Kellogg requesting titles of safety training .2
2/12/2015	MD	0.2	md/mr call with defense counsel about discovery production 0.2
2/12/2015	MR	0.1	JS/MR discuss OSHA listing to search for Kellogg citations
2/12/2015	MR	0.4	search on OSHA database for safety violations by Defendant
2/12/2015	MR	0.1	DG/AR/MR discuss workers comp claims for RSR/TMs
2/12/2015	DG	0.1	DG/AR/MR discuss workers comp claims for RSR/TMs
2/12/2015	MR	0.1	AR/MR discuss OSHA database relating to Kellogg
2/12/2015	JS	0.1	JS/MR discuss OSHA listing to search for Kellogg citations
2/12/2015	MR	0.2	md/mr call with defense counsel about discovery production 0.2
2/12/2015	MD	0.2	md/mr discussing discovery needed to take Nilles' deposition and follow up on ESI request 0.2
2/12/2015	MR	0.3	reviewed and suggested edits for Kellogg 30b6 notice
2/12/2015	MD	0.1	md/mr call defense counsel regarding 5th/6th discovery demands 0.1
2/12/2015	MR	0.2	md/mr discussing discovery needed to take Nilles' deposition and follow up on ESI request 0.2
2/12/2015	MD	0.1	md prepare for call with defense counsel 0.1
2/12/2015	MD	0.2	md review emails re Randy Nilles 0.2
2/12/2015	MD	0.3	md outline deposition of randy Nilles 0.3
2/12/2015	MD	0.2	md emails with defense counsel about cut-off date for opt-ins to respond to discovery 0.2
2/12/2015	JS	0.2	send links to MR for OSHA investigation and violation spreadsheets and online searching
2/12/2015	MD	0.1	md/mr reviewing itineraries for hours worked 0.1
2/12/2015	MR	0.1	md/mr call defense counsel regarding 5th/6th discovery demands 0.1
2/12/2015	MR	0.1	md/mr reviewing itineraries for hours worked 0.1
2/13/2015	MD	0.2	md review and edit 30b6 notice and send to defense counsel 0.2
2/13/2015	KW	0.7	telephone calls and emails to plaintiffs. [client][client][client][client][client] to discuss documents they have and discuss hoe to get the documents here asap .5 add notes to case information .2

Date	Staff	Amount of Time	Description
2/13/2015	KW	1.2	review production spreadsheets, determine number of Answers to Interrogatories produced to defendant determine the number of plaintiffs for whom we have produced documents update spreadsheet of responses for those plaintiffs who do not have email
2/13/2015	CLER	0.1	create PDF format of correspondence recd from D. (response to ltr dated 1/27/2015)
2/13/2015	KW	0.1	Update Discovery tracking spreadsheet to reflect production received from defendant on 2/11/15
2/13/2015	KW	0.6	mr/jp/kw paralegal meeting to determine plaintiff production information needed and to determine and assign tasks
2/13/2015	KW	0.4	telephone call from plaintiff Jane Hoven concerning not completing questions to inform Answer to Interrogatories .2 email to paralegal JP to forward plaintiff's information and request to email another questions to inform Answer to Interrogatories .1 write case notes and add to electronic file .1
2/13/2015	KW	1.4	Determine SOL date for each of 66 plaintiffs whom Defendant has on an Exclusion list- .4 Create Merge Mail spreadsheet of plaintiff's name, address, Consent filed date, SOL date and date Def. indicates plaintiff ceased employment- to prepare for mailing to plaintiffs .9 email link to draft letter to litigation team for final review and revision .1
2/13/2015	JP	0.3	jp/kw plan process to gather responses needed form non-responsive plaintiffs .3
2/13/2015	JP	0.6	mr/jp/kw paralegal meeting to determine plaintiff production information needed and to determine and assign tasks
2/13/2015	MR	0.6	mr/jp/kw paralegal meeting to determine plaintiff production information needed and to determine and assign tasks
2/13/2015	KW	0.3	jp/kw plan process to gather responses needed form non-responsive plaintiffs .3
2/16/2015	MD	1	md outlining Argument against Kellogg's motion to take additional deposition 1.0
2/16/2015	MD	1.5	md creating deposition outline for Nilles' deposition 1.5
2/16/2015	MD	0.2	md read Kellogg's motion to take 50 additional deposition 0.2
2/17/2015	KW	0.1	schedule meeting of support staff and attorney M Dunn to determine scope and content of document search needed to support depositions of defendants
2/17/2015	KW	0.2	draft email and respond to emails concerning possible deposition of Thomas Peterson .2
2/17/2015	KW	0.2	email to named plaintiff [client] concerning contact information for possible deponent [client] .2
2/17/2015	MD	0.1	MD/KW confer regarding work needed to prepare for depositions of def.
2/17/2015	KW	0.2	draft email to named plaintiff regarding contact information for former manager and possible deponent .2
2/17/2015	KW	0.1	MD/KW confer regarding work needed to prepare for depositions of def.
2/17/2015	CLER	0.1	create PDF format of document recd from client ([client])
2/17/2015	KW	0.2	review questionnaire responses to find contact information for former Kellogg Employee [client] .2
2/17/2015	MD	1.5	md drafting opposition brief to 50 additional deposition 1.5
2/17/2015	MD	0.3	md corresponding with defense counsel about next week's depositions 0.3
2/17/2015	MD	0.2	md reviewing deponents LinkedIn account profile for next week's deposition 0.2
2/17/2015	KW	0.3	telephone call to plaintiff [client]n to attempt to get contact information for former Kellogg employee [client] .2 add information to case notes .1



Date	Staff	Amount of Time	Description
2/17/2015	MD	0.2	md reviewing 30b6 deposition testimony to use in Argument against Kellogg's motion to take additional depositions .0.2
2/17/2015	KW	0.3	Linked in Search for Andrew Hart- to establish contact information .1 search of electronic data for contact information for A. Hart- proposed deponent .2
2/17/2015	KW	0.2	MR/KW confer regarding document search to be done to prepare for depositions of defendants .2
2/17/2015	KW	0.2	telephone call from plaintiff [client] to discuss litigation progress .2
2/17/2015	MR	0.2	MR/KW confer regarding document search to be done to prepare for depositions of defendants .2
2/18/2015	AN	0.7	MR/AN/JK/KW support staff team meeting to work out plan to Merge mail plaintiffs Kellogg indicates are outside SOL; review and understand spreadsheet of data related to responses to questions and production to defendant; determine information needed to complete data and report whole litigation team to plan next steps in litigation strategy
2/18/2015	MR	0.7	MR/AN/JK/KW support staff team meeting to work out plan to Merge mail plaintiffs Kellogg indicates are outside SOL; review and understand spreadsheet of data related to responses to questions and production to defendant; determine information needed to complete data and report whole litigation team to plan next steps in litigation strategy
2/18/2015	AG	0.2	arrange court reporters for depositions (Bradley Chew on Tuesday, February 24th and Cheryl O'Connell on Wednesday, February 25th)
2/18/2015	KW	0.8	DG/MD/MR/AN/JK/KW Litigation team meeting to determine work needing completion and determine tasks to prepare for depositions scheduled for 2/24 and 2/25 Report data regarding plaintiffs' responsiveness to def. discovery demands determine work needed to respond to Def. motion to take 50 more depositions
2/18/2015	KW	0.3	save to pdf website and LinkedIn site for T. Peterson, ex-Kellogg manager .2 email information to attorney M. Dunn .1
2/18/2015	KW	0.2	respond to emails from named plaintiff [client] regarding contact information needed for ex-Kellogg Manager .2
2/18/2015	KW	0.7	MR/AN/JK/KW support staff team meeting to work out plan to Merge mail plaintiffs Kellogg indicates are outside SOL; review and understand spreadsheet of data related to responses to questions and production to defendant; determine information needed to complete data and report whole litigation team to plan next steps in litigation strategy
2/18/2015	JK	0.9	File search on client docs and def docs for Chew and O'Connell - 0.4 hrs., MR/JK reviewed search methods for relevant file discovery for Chew and O'Connell
2/18/2015	JK	0.8	DG/MD/MR/AN/JK/KW Litigation team meeting to determine work needing completion and determine tasks to prepare for depositions scheduled for 2/24 and 2/25 Report data regarding plaintiffs' responsiveness to def. discovery demands determine work needed to respond to Def. motion to take 50 more depositions
2/18/2015	MR	0.8	DG/MD/MR/AN/JK/KW Litigation team meeting to determine work needing completion and determine tasks to prepare for depositions scheduled for 2/24 and 2/25 Report data regarding plaintiffs' responsiveness to def. discovery demands determine work needed to respond to Def. motion to take 50 more depositions

Date	Staff	Amount of Time	Description
2/18/2015	AN	0.8	DG/MD/MR/AN/JK/KW Litigation team meeting to determine work needing completion and determine tasks to prepare for depositions scheduled for 2/24 and 2/25 Report data regarding plaintiffs' responsiveness to def. discovery demands determine work needed to respond to Def. motion to take 50 more depositions
2/18/2015	MD	0.8	DG/MD/MR/AN/JK/KW Litigation team meeting to determine work needing completion and determine tasks to prepare for depositions scheduled for 2/24 and 2/25 Report data regarding plaintiffs' responsiveness to def. discovery demands determine work needed to respond to Def. motion to take 50 more depositions
2/18/2015	DG	0.8	DG/MD/MR/AN/JK/KW Litigation team meeting to determine work needing completion and determine tasks to prepare for depositions scheduled for 2/24 and 2/25 Report data regarding plaintiffs' responsiveness to def. discovery demands determine work needed to respond to Def. motion to take 50 more depositions
2/18/2015	JK	0.7	MR/AN/JK/KW support staff team meeting to work out plan to Merge mail plaintiffs Kellogg indicates are outside SOL; review and understand spreadsheet of data related to responses to questions and production to defendant; determine information needed to complete data and report whole litigation team to plan next steps in litigation strategy
2/18/2015	KW	0.3	review, edit and accept revisions to draft letter to be sent to those Kellogg has listed on the Exclusion List-.2 update Merge mail spreadsheet to prepare for Merge mailing to plaintiffs Kellogg has listed on the Exclusion list .1
2/19/2015	KW	0.4	prepare deposition notices for Bradley Chew and Cheryl O'Connell .2 print to pdf .1 email to attorney for review and Noticing Def. .1
2/19/2015	MD	0.1	md/kw determine calendaring and deposition notices needed for B. Chew and C. O'Connell
2/19/2015	KW	0.3	MR/KW review Master spreadsheet of data regarding each plaintiff's response to questions, Interrogatories and document production to determine data to be researched and added to the spreadsheet determine most efficient division of labor to complete tasks.3
2/19/2015	KW	0.2	respond to email questions regarding case progress from plaintiff JP update contact information in electronic case files
2/19/2015	KW	1.4	Research which plaintiffs have produced documents to defendant record information for each plaintiff on Master spreadsheet
2/19/2015	KW	0.1	email to respond to plaintiff RM's questions regarding case progress and discovery period
2/19/2015	MR	0.3	MR/KW review Master spreadsheet of data regarding each plaintiff's response to questions, Interrogatories and document production to determine data to be researched and added to the spreadsheet determine most efficient division of labor to complete tasks.3
2/19/2015	JK	1.2	MR/JK Discussed ways to import data from PDF phone bills into excel 1.2
2/19/2015	KW	0.1	md/kw determine calendaring and deposition notices needed for B. Chew and C. O'Connell
2/19/2015	CLER	1.4	finalize letter to 66 plaintiffs Kellogg challenges because of SOL .2 prepare mailing using Mail Merge process mailing
2/19/2015	MR	1.2	MR/JK Discussed ways to import data from PDF phone bills into excel 1.2
2/20/2015	DG	0.2	email to litigation team re additional work needed to prepare info needed in response brf re 50 additional depositions (eg time and expense data, deposition questions culled, list of burdens, etc. .2

Date	Staff	Amount of Time	Description
2/20/2015	JK	7.3	Continued research for software to convert pdf phone bills to excel data 1.0, experimented with ABBYY PDF Transformer 0.8, experimented with ABBYY Fine Reader 0.8,expiemented with PDF to XLS 0.7,Attempted approach 1 using PDF2XL 1.3,Attempted approach 2 using PDF2XL 0.8,Attempted approach 3 using PDF2XL 0.7,parsed data from original format into substrings 0.5,added timestamps to each entry 0.7, concatenated extraneous location cells 0.3,organized data into correct format for analysis 0.5
2/20/2015	CLER	1.1	create PDF format of documents recd from client ([client])
2/20/2015	CM	0.7	check that all deposition transcripts have been paid for (.2), calculate average cost of deposition transcript and travel (.2), email to team re review of time records (.1), review brief to see what is needed (.2)
2/20/2015	DG	0.1	DG/CM discuss analysis of costs of depositions (.1)
2/20/2015	CM	0.1	DG/CM discuss analysis of costs of depositions (.1)
2/20/2015	CLER	0.4	File client documents and deposition transcripts
2/20/2015	MR	4	Assist JK with research for software to convert pdf phone bills to excel data .5, tried paste and copy from various pdf viewers into notepad .8, tried paste and copy using various pdf viewers into excel .7, tried full row conversion using Abbyy .3, tried full row conversion using PDF Converter .3, assist JK in parsing data from original format into substrings 0.3, added timestamps to each entry 0.4, concatenated extraneous location cells 0.3, organized data into correct format for analysis 0.4
2/20/2015	CM	0.2	revise calculation of average deposition travel cost (.2)
2/20/2015	DG	2.4	edit opposition to Kellogg's motion for 50 additional depositions 2.2; email briefs, docs, to MD .2
2/20/2015	CM	1.5	analysis of costs of depositions(1.5)
2/21/2015	MR	2.2	updated master rog answer workbook to include answers produced column 1.6, investigated duplicates answers produced issue .6
2/22/2015	MR	0.2	email data to paras about people who have duplicate rog answers produced .2
2/22/2015	MR	0.5	updated master answer to rogs workbook to show answers not yet produced and docs not yet produced sheets .4, email to para KW and JP about updated master excel workbook .1
2/23/2015	KW	0.3	MR/KW plan work to research Def. Produced documents to find exhibits needed for deposition of B. Chew and R. Nilles
2/23/2015	DG	0.5	md/dg discussing arguments to make in brief opposing additional depositions 0.2; review edits to brief .2; review CM declaration re same .1
2/23/2015	KW	2.9	research deposition transcripts of plaintiffs and 30(b)(6) to select exhibits for PLT response to Def. request for additional depositions select and pdf exhibits
2/23/2015	MR	1.3	locate variable labor reports for two deponents Chew and Nilles
2/23/2015	KW	0.5	MD/KW review depositions scheduled for this week review and add to list of possible exhibits needed review documents produced by Def. to determine applicability to B Chew deposition scheduled for 2/24/15
2/23/2015	MD	0.5	MD/KW review depositions scheduled for this week review and add to list of possible exhibits needed review documents produced by Def. to determine applicability to B Chew deposition scheduled for 2/24/15
2/23/2015	KW	0.5	telephone call from plaintiff [client] requesting a case update and discussing proof he has to offer to support plaintiffs' claims .3 add information to case notes .1 email information to litigation team .1
2/23/2015	JK	0.1	MR/JK/KW confer regarding excel documents to be prepared as a deposition exhibit .1

Date	Staff	Amount of Time	Description
2/23/2015	MR	0.1	MR/JK/KW confer regarding excel documents to be prepared as a deposition exhibit .1
2/23/2015	KW	0.2	use Merge pdf software to create exhibits for deposition of B. Chew .2
2/23/2015	CM	0.3	KW/CM meet re tasks to complete brief in opposition to def request for more depositions (.3), MD (.2)
2/23/2015	MD	0.2	KW/CM meet re tasks to complete brief in opposition to def request for more depositions (.3), MD (.2)
2/23/2015	KW	0.1	MR/JK/KW confer regarding excel documents to be prepared as a deposition exhibit .1
2/23/2015	KW	0.3	KW/CM meet re tasks to complete brief in opposition to def request for more depositions (.3), MD (.2)
2/23/2015	MA	0.1	call from opt-in [client] re: letter
2/23/2015	JK	0.3	JK/MR created pdf of client itinerary excel sheet for deposition of Chew
2/23/2015	CLER	0.8	create PDF format of documents recd from client ([client])
2/23/2015	KW	0.2	respond to email from plaintiff [client] -responding to her questions about case developments
2/23/2015	MR	0.3	MR/KW plan work to research Def. Produced documents to find exhibits needed for deposition of B. Chew and R. Nilles
2/23/2015	MD	0.2	md/dg discussing arguments to make in brief opposing additional depositions 0.2
2/23/2015	CM	0.1	MD/CM discuss finalization of declaration, preparation of table of authorities for brief (.1)
2/23/2015	CM	0.4	proofread brief (.4)
2/23/2015	CM	0.6	prepare final declaration for brief (.1), prepare table of contents and table of authorities (.5)
2/23/2015	KW	0.7	review client document files for all 42 plaintiffs in NY to determine exhibits for deposition of Zone Manager form Syracuse area- B. Chew .5 choose appropriate exhibits .2
2/23/2015	MD	0.2	MD/KW confer regarding most effective exhibits for deposition of Zone Manager B. Chew .2
2/23/2015	KW	0.2	MD/KW confer regarding most effective exhibits for deposition of Zone Manager B. Chew .2
2/23/2015	MD	5	md preparing for deposition 5.0
2/23/2015	MD	2.5	md finalize brief to respond to Kellogg's motion for 50 depositions 2.5
2/23/2015	MD	0.6	md/dg discussing deposition topics to cover with bradley chew 0.6
2/23/2015	DG	2.1	edits to brief opposing K's 50 additional depositions 2; review KW selection of deposition transcript for inclusion .1
2/23/2015	KW	0.2	MD/KW confer regarding most effective exhibits for deposition of Zone Manager B. Chew .2
2/23/2015	DG	0.1	DG/CM check in re tasks for brief (.1)
2/23/2015	CM	0.1	DG/CM check in re tasks for brief (.1)
2/23/2015	CM	0.8	check states of opt-in depositions (.4), draft declaration re deposition costs (.4)
2/23/2015	MD	0.2	MD/KW confer regarding most effective exhibits for deposition of Zone Manager B. Chew .2
2/23/2015	MD	0.1	MD/CM discuss finalization of declaration, preparation of table of authorities for brief (.1)
2/24/2015	JK	0.3	JK/MR create pivot table for client phone bill data
2/24/2015	AN	0.5	dg/md/mr/an/kw litigation team meeting to discuss deposition testimony of B. Chew, identify potential exhibits, discuss litigation strategy for questioning of deponent

Date	Staff	Amount of Time	Description
2/24/2015	DG	6.5	dg/md/mr/an/kw litigation team meeting to discuss deposition testimony of B. Chew, identify potential exhibits, discuss litigation strategy for questioning of deponent .5; 2nd seat deposition of Chew 6
2/24/2015	MD	0.5	dg/md/mr/an/kw litigation team meeting to discuss deposition testimony of B. Chew, identify potential exhibits, discuss litigation strategy for questioning of deponent
2/24/2015	MR	0.5	dg/md/mr/an/kw litigation team meeting to discuss deposition testimony of B. Chew, identify potential exhibits, discuss litigation strategy for questioning of deponent
2/24/2015	JK	0.3	JK/MR(.2) Completed DT search to find originator of relevant documents
2/24/2015	KW	0.6	listen in on deposition to add information from plaintiffs and propose questions in deposition of B. Chew .6
2/24/2015	KW	1.8	review Def. email production, Def. document production and documents produced by plaintiffs in order to select potential exhibits for the deposition of C. O'Connell scheduled for 2/25/15 add exhibits to electronic file of documents for deposition
2/24/2015	JK	2.3	compiled cell phone bill data into ranges to determine frequency of calls for given time periods 0.8, created pivot tables for cell phone time of call data 0.9, created pivot table of duration of cell phone call data 0.4, minor formatting 0.2
2/24/2015	MD	6.5	md take deposition 6.5, including discussing deposition during lunch
2/24/2015	KW	0.5	dg/md/mr/an/kw litigation team meeting to discuss deposition testimony of B. Chew, identify potential exhibits, discuss litigation strategy for questioning of deponent
2/24/2015	JK	1	jk corrected OCR import errors from phone bills to excel 0.4, calculated the frequency and total duration of telephone calls 0.4, minor formatting 0.2
2/24/2015	MR	0.3	MR/JK attend portion of deposition of zone mgr chew that involved BW-SAP sales data reporting .3
2/24/2015	MR	0.3	JK/MR create pivot table for client phone bill data
2/24/2015	AN	0.3	Research job descriptions for TM/RSR's for use in deposition
2/24/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#301 - RESPONSE, by Plaintiff Patty Thomas, to [300] Second MOTION Additional Depositions from Representative Sample of Plaintiffs . (Attachments: # (1) Declaration, # (2) Exhibit Portion of 30(b)(6) Transcript)(Dunn, Matt)
2/24/2015	MD	2	md prepare for deposition 2.0
2/24/2015	MD	0.4	MD/KW meet to discuss, review and choose exhibits for O'Connell deposition .4
2/24/2015	MR	0.2	JK/MR(.2) Completed DT search to find originator of relevant documents
2/24/2015	KW	0.2	pdf exhibits for O'Connell deposition add exhibits to electronic file ot produce to Def.
2/24/2015	JK	0.3	MR/JK attend portion of deposition of zone mgr chew that involved BW-SAP sales data reporting .3
2/24/2015	MR	0.5	examine Bussell deposition for her testimony related to planograms .2, print out relevant pages and highlight word "planogram" in printouts of Bussell deposition for atty DG .3
2/24/2015	KW	0.4	MD/KW meet to discuss, review and choose exhibits for O'Connell deposition .4
2/24/2015	KW	0.9	research documents and Bates numbers for exhibits to be used it deposition of B. Chew .9

Date	Staff	Amount of Time	Description
2/25/2015	KW	1.4	review documents sent by plaintiff [client] related to [client] employment and his wife's employment at Kellogg to prepare documents for production to defendant to comply with Def. discovery demands
2/25/2015	KW	0.8	prepare Answers to Interrogatories for plaintiffs who responded to questions by US Mail prepare cover letter to mail completed Answer to plaintiffs for review and approval prior to production to def. update electronic files of production process
2/25/2015	KW	0.9	prepare exclusion letters for those plaintiffs Def. claims are excluded because of working out of job titles in the complaint .4 process mailing .1 organize Exclusion spreadsheet- create worksheets to indicate those excluded for SOL reasons, out of job title reasons and those who are RSMs .4
2/25/2015	MD	6	md take Cheryl O'Connell deposition 6.0
2/25/2015	KW	0.3	MR/KW work on HighTail program to transmit document production to defendant in response to def. discovery demands
2/25/2015	MR	0.3	MR/KW work on HighTail program to transmit document production to defendant in response to def. discovery demands
2/25/2015	KW	0.5	search defendant produced documents to select exhibits for deposition of Account Executive C. O'Connell .5
2/25/2015	KW	0.1	organize paper files
2/25/2015	KW	0.5	research HighTail production emails to verify 24 plaintiffs Answers to Interrogatories were prepared by using mailed questions- .4 email information to IT litigation paralegal .1
2/25/2015	KW	0.2	Update Excel spreadsheet tracking plaintiffs' responses to Def. Discovery demands .2
2/25/2015	DG	5.2	deposition 10-1, 1:50-2:45; 4-5:10 (5.2 total for the part I was in)
2/25/2015	JK	2.1	JK Created graph of calls per hour 0.6, created graph of total speaking time per hour 0.7, created pie chart of call distribution 0 .5, created chart of call vs Time of day probabilities 0.3
2/25/2015	MR	0.7	confer with JK about analysis of client phone bill data
2/25/2015	KW	1.5	Review, organize, redact, Bates stamp and produce to defendant plaintiffs documents in response to defendant's discovery demands; Plaintiffs: [client][client][client][client] and [client]
2/26/2015	DG	0.2	md/dg/jp discussing testimony from [client] deposition 0.2
2/26/2015	MD	0.2	md/dg/jp discussing testimony from [client] deposition 0.2
2/26/2015	JP	0.2	md/dg/jp discussing testimony from [client] deposition 0.2
2/26/2015	KW	0.2	use HighTail to produce Plaintiff documents to defendant .2
2/26/2015	KW	0.4	produce plaintiff documents in response to defendant's discovery demands .4
2/26/2015	MR	0.7	research Hightail problem in sending docs to Def .4, set up Hightail Express for para KW to use .2, check in with KW on progress of document upload .1
2/26/2015	JK	1.2	JK Summary of cell phone calcs - calls per any given hour 0.3, total calls per hour 0.3, calls as % of total calls 0.2, total time of calls 0.4
2/26/2015	MD	1	md review status of discovery production/documents 1.0
2/27/2015	MD	0.3	md review deposition list and email defense counsel about deposition dates 0.3
2/27/2015	CLER	0.2	PCF Client regarding update of case (confirm contact information, [client])
2/27/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#302 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [300] Second MOTION Additional Depositions from Representative Sample of Plaintiffs (Nelson, James)



Date	Staff	Amount of Time	Description
2/27/2015	MR	1.2	examine analysis of plaintiff's phone records .4, write up additional commentary for it .7, and email to Kellogg plaintiff team .1
2/27/2015	CLER	0.2	File client documents
3/2/2015	MR	0.2	locate and email additional questions responses to paras JP and KW for review
3/2/2015			DG/MD/MR/JP/JK/KW litigation team meeting to determine Kellogg staff titles still to be deposed; deposition scheduling; planning work needed to complete response to Def. Discovery demands; determine discovery still not produced by defendant and how to proceed to get it; outline motion to compel 1.1; review deposition transcript from ESI 30b6 deposition re time study .2
	DG	1.3	
3/2/2015	MR	0.3	locate, review and email to attys/paras excerpt of [client] deposition relating to time study
3/2/2015	KW	0.3	produce notes of litigation team meeting-designating staff for each task .2 circulate to litigation team with hyperlink .1
3/2/2015			DG/MD/MR/JP/JK/KW litigation team meeting to determine Kellogg staff titles still to be deposed; deposition scheduling; planning work needed to complete response to Def. Discovery demands; determine discovery still not produced by defendant and how to proceed to get it; outline motion to compel
	JP	1.1	
3/2/2015			DG/MD/MR/JP/JK/KW litigation team meeting to determine Kellogg staff titles still to be deposed; deposition scheduling; planning work needed to complete response to Def. Discovery demands; determine discovery still not produced by defendant and how to proceed to get it; outline motion to compel
	MR	1.1	
3/2/2015			DG/MD/MR/JP/JK/KW litigation team meeting to determine Kellogg staff titles still to be deposed; deposition scheduling; planning work needed to complete response to Def. Discovery demands; determine discovery still not produced by defendant and how to proceed to get it; outline motion to compel
	JK	1.1	
3/2/2015			DG/MD/MR/JP/JK/KW litigation team meeting to determine Kellogg staff titles still to be deposed; deposition scheduling; planning work needed to complete response to Def. Discovery demands; determine discovery still not produced by defendant and how to proceed to get it; outline motion to compel
	MD	1.1	
3/2/2015			JK/MR (0.3) DTsearch for deponent jim kaminski 0.5, DTsearch for deponent chris kelly 0.4, DTsearch for deponent Randy Nilles 0.2,DTsearch for deponent Lisha Pennington 0.7
	JK	1.8	
3/2/2015			MR/JK/KW plan work needed to identify potential exhibits for 4 depositions of Defendants scheduled for next week
	MR	0.2	
3/2/2015			MR/JK/KW plan work needed to identify potential exhibits for 4 depositions of Defendants scheduled for next week
	JK	0.2	
3/2/2015			download personnel files and cell phone records produced by defendant .4 add files to Def. Document Production spreadsheet number files iwth Bates Numbers for efficient access by litigation team-
	KW	1.5	
3/2/2015			JP/MR/KW review master Spreadsheet tracking Plaintiffs' responses to defendant's discovery demands; revise as needed to update spreadsheet; prepare report for litigation team; determine tasks and questions regarding priorities to be determined by litigation team .9
	KW	0.9	
3/2/2015			md coordinating with defense counsel about depositions of Kellogg witnesses 0.2
	MD	0.2	
3/2/2015			MR/JK/KW plan work needed to identify potential exhibits for 4 depositions of Defendants scheduled for next week
	KW	0.2	

Date	Staff	Amount of Time	Description
3/2/2015	KW	1.1	DG/MD/MR/JP/JK/KW litigation team meeting to determine Kellogg staff titles still to be deposed; deposition scheduling; planning work needed to complete response to Def. Discovery demands; determine discovery still not produced by defendant and how to proceed to get it; outline motion to compel
3/2/2015	KW	0.3	MD/KW/AN Discuss information search for Deponents scheduled for next week
3/2/2015	MD	0.3	MD/KW/AN Discuss information search for Deponents scheduled for next week
3/2/2015	JP	0.9	JP/MR/KW review master Spreadsheet tracking Plaintiffs' responses to defendant's discovery demands; revise as needed to update spreadsheet; prepare report for litigation team; determine tasks and questions regarding priorities to be determined by litigation team .9
3/2/2015	AN	0.3	MD/KW/AN Discuss information search for Deponents scheduled for next week
3/2/2015	MR	0.9	JP/MR/KW review master Spreadsheet tracking Plaintiffs' responses to defendant's discovery demands; revise as needed to update spreadsheet; prepare report for litigation team; determine tasks and questions regarding priorities to be determined by litigation team .9
3/2/2015	MD	0.3	md preparing for meeting concerning case status with team 0.3
3/2/2015	MR	0.3	JK/MR (0.3) DTsearch for deponent jim kaminski 0.5, DTsearch for deponent chris kelly 0.4, DTsearch for deponent Randy Nilles 0.2,DTsearch for deponent Lisha Pennington 0.7
3/2/2015	CLER	0.1	create PDF format of documents recd from client ([client] - performance reviews)
3/3/2015	KW	0.6	prepare deposition notices for L. Pennington, R. Nilles, C. Kelly and J. Kaminski .4 print to separate pdfs .1 email attachments to attorney .1
3/3/2015	MD	0.2	md review deposition notices and send to defense counsel 0.2
3/3/2015	KW	0.1	email conflicts to be resolved to litigation IT paralegal
3/3/2015	KW	2.1	research electronic files of questions completed and Answers to Interrogatories Produced and Bates Stamped Documents produced to resolve questions of duplicates produced, conflicting information from plaintiffs and actual production to defendant 2.1
3/4/2015	MD	1	md preparing for depositions 1.0
3/4/2015	KW	0.4	MD/JP/KW review possible exhibits for deposition of Lisha Pennington; determine documentation needed from Def.; determine documentation needed from documents in our electronic file .4
3/4/2015	JP	2.6	JP/KW meet to go through each of 20 case files and discovery files to complete a case transfer from KW to JP
3/4/2015	JP	0.5	discussed her knowledge of deponents Chris Kelly and Lisha Pennington for prep for depositions
3/4/2015	KW	0.2	attempted telephone call to plaintiff [client] who does not have email about his need to complete the questions and return it to us asap so we can complete Ans. to Interrogatories .1 add information to case record .1
3/4/2015	KW	2.2	JP/KW meet to go through each of 20 case files and discovery files to complete a case transfer from KW to JP
3/4/2015	KW	1.2	research documents for possible exhibits for deposition of Lisha Pennington .6
3/4/2015	KW	0.4	MD/KW review and analyze Variable Labor reports and formulas to determine what needs to be requested of defendants to prepare for deposition of Lisha Pennington .4

Date	Staff	Amount of Time	Description
3/4/2015	KW	0.2	telephone call to schedule appointment to gather information needed to respond to Defendant's discovery demands added note to electronic case file
3/4/2015	JP	0.5	JP/KW draft email to be sent to plaintiffs who produced Answer to Interrogatories and who have not produced documents
3/4/2015	JP	0.7	md/jp call with potential witness 0.7
3/4/2015	KW	0.3	telephone call from current employee who wants to support this lawsuit- .2 add information to electronic case file .1
3/4/2015	MD	0.7	md/jp call with potential witness 0.7
3/4/2015	MD	0.4	MD/JP/KW review possible exhibits for deposition of Lisha Pennington; determine documentation needed from Def.; determine documentation needed from documents in our electronic file .4
3/4/2015	JP	0.4	MD/JP/KW review possible exhibits for deposition of Lisha Pennington; determine documentation needed from Def.; determine documentation needed from documents in our electronic file .4
3/4/2015	KW	0.4	research scorecards for plaintiff deponents: Dye, Mastenbrook, Sayedi, Gibson and Central regional scorecards as potential exhibits for deposition of Lisha Pennington Productivity Manager DSD for Central Region
3/4/2015	KW	0.3	telephone call to plaintiff [client] who does not have email about his need to complete the questions and return it to us asap so we can complete Ans. to Interrogatories .2 add information to case record .1
3/4/2015	JP	2.2	JP/KW meet to go through each of 20 case files and discovery files to complete a case transfer from KW to JP
3/4/2015	KW	0.5	JP/KW draft email to be sent to plaintiffs who produced Answer to Interrogatories and who have not produced documents
3/5/2015	JP	0.8	jp/kw transfer of discovery file and discussion of production process .8
3/5/2015	KW	0.8	jp/kw transfer of discovery file and discussion of production process .8
3/5/2015	MR	0.5	JK/ MR (.5) Searched through plaintiff phone bill records to find ta[client]et for analysis 0.7, prepared OCD software to import data into excel 0.6, formatted data once entered into excel 0.3
3/5/2015	JK	0.3	JK/MR Discussed method for future plaintiff phone bill analysis 0.3
3/5/2015	AG	0.2	Arrange court reporter for depositions (Pennington, Nilles, Kelly, and Kaminski)
3/5/2015	MR	0.3	JK/MR Discussed method for future plaintiff phone bill analysis 0.3
3/5/2015	MD	0.2	md email defense counsel about documents needed for depositions 0.2
3/5/2015	MR	0.8	JK/ MR Imported plaintiff phone bills into excel using abby fine reader 0.4, Imported plaintiff phone bills into excel using adobe pro 0.4
3/5/2015	MD	2	md developing deposition outline and reviewing documents 2.0
3/6/2015	CLER	0.2	Transfer documents recd from email system to docket file and create file copy(FINAL ASCII from the 2-24-2015 deposition of Mr. Chew, compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
3/6/2015	AN	0.3	Copy and scan exhibits for Pennington Deposition
3/6/2015	MD	0.2	md/dg discussing topics to cover during pennington deposition 0.2
3/6/2015	DG	0.2	md/dg discussing topics to cover during pennington deposition 0.2
3/6/2015	MD	0.3	md reading KEHE summary judgment briefing 0.3
3/6/2015	DG	0.7	md/dg/mr discussing ESI needed pursuant to Kellogg response regarding ESI protocol 0.7
3/6/2015	CLER	0.2	File Client documents
3/6/2015	MR	0.7	md/dg/mr discussing ESI needed pursuant to Kellogg response regarding ESI protocol 0.7

Date	Staff	Amount of Time	Description
3/6/2015	MD	0.7	md/dg/mr discussing ESI needed pursuant to Kellogg response regarding ESI protocol 0.7
3/6/2015	MD	2.5	md editing deposition outline and reviewing exhibits for Pennington depositions 2.5
3/6/2015	MD	0.2	md preparing for ESI meeting with dg and mr 0.2
3/9/2015	MD	0.2	MD/MR discuss format of exhibits to use in depositions
3/9/2015	MR	0.2	MD/MR discuss format of exhibits to use in depositions
3/9/2015	ME	0.9	MA/ME/JP - review process of Bates stamping and sending document files to defendant by Bate stamping and sending Johnson, S and Argentino docs
3/9/2015	JP	0.7	TC with client to discuss defendant deponents Pennington and Chris Kelly and to review documents she has produced to us
3/9/2015	ME	1.2	md/jp/dg/me meeting re going over exhibits and subjects for deposition of pennington 1.2
3/9/2015	ME	2.2	Reviewed documents to obtain background information needed to perform role as paralegal on the case
3/9/2015	DG	1	dg/md review exhibits for deposition tomorrow 1
3/9/2015	MA	0.9	MA/ME/JP - review process of Bates stamping and sending document files to defendant by Bate stamping and sending [client] and [client] docs
3/9/2015	JP	0.9	MA/ME/JP - review process of Bates stamping and sending document files to defendant by Bate stamping and sending [client] and [client] docs
3/9/2015	DG	2.2	md/jp/dg/me going over deposition of pennington 1.2; review and edit outline to prepare for deposition 1
3/9/2015	JP	1.2	md/jp/dg/me going over deposition of pennington 1.2
3/9/2015	JP	0.9	MR/JP work through FTP problems in uploading spreadsheets for Pennington deposition
3/9/2015	CLER	0.2	create PDF format of documents recd from client
3/9/2015	ME	0.5	me - indexed documents provided by defendants
3/9/2015	JP	1.2	prepare exhibit documents for deposition of Pennington
3/9/2015	JP	0.7	review client docs for production to defendant
3/9/2015	MR	0.9	MR/JP work through FTP problems in uploading spreadsheets for Pennington deposition
3/9/2015	MD	1	dg/md review exhibits for deposition tomorrow 1
3/9/2015	MD	1.2	md/jp/dg/me going over deposition of pennington 1.2
3/9/2015	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(FINAL ASCII from the 2-25-2015 deposition of Ms. O'Connell. readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
3/9/2015	JP	0.5	md/jp discussing exhibits to use for deposition 0.5
3/9/2015	MD	0.5	md/jp discussing exhibits to use for deposition 0.5
3/10/2015	ME	0.2	JLP/ME/MA redact and Bates stamp documents from plaintiff [client] in order ot produce to defense counsel
3/10/2015	JP	0.2	JLP/ME/MA redact and Bates stamp documents from plaintiff [client] in order ot produce to defense counsel
3/10/2015	MA	0.2	JLP/ME/MA redact and Bates stamp documents from plaintiff [client] in order ot produce to defense counsel
3/10/2015	MR	0.6	dg/md/mr [.3] deposition of Alisha Pennington 10am - 6:15 [7.6]; review testimony for next depositions .3 for all
3/10/2015	AG	0.1	ECF Changes (substitute Misty Emerick for Kathy Weiss on the ECF account for notifications)
3/10/2015	DG	0.3	dg/jp discuss Pennington testimony at 1st half for prep of further questions .3

Date	Staff	Amount of Time	Description
3/10/2015	ME	1.1	document search to prepare for deposition
3/10/2015	CLER	0.2	PCF client (status update, confirm current contact)
3/10/2015	JP	0.3	dg/jp discuss Pennington testimony at 1st half for prep of further questions .3
3/10/2015	CLER	0.2	prepare FedEx Label for client (mailing of documents, H. Pellegrino)
3/10/2015	AG	0.1	emailed client (FedEx Label for mailing of documents, H. Pellegrino)
3/10/2015	AG	0.6	Produce documents to Court reporter TSG (uploading of Exhibits for Deposition of Nilles)
3/10/2015	DG	0.3	prepare for deposition by reviewing exhibits .3
3/10/2015	ME	0.2	me/jp meeting re documents to be produced for deposition
3/10/2015	MD	7.9	dg/md/mr [.3] deposition of Alisha Pennington 10am - 6:15 [7.6]; review testimony for next depositions .3 for all
3/10/2015	DG	7.9	dg/md/mr [.3] deposition of Alisha Pennington 10am - 6:15 [7.6]; review testimony for next depositions .3 for all
3/10/2015	AG	0.1	prepare ltr to client (return docs, [client])
3/10/2015	ME	4.1	Prepared documents to be produced to defense counsel for deposition
3/10/2015	CLER	0.2	prepare mailing to client (return docs, [client])
3/11/2015	MD	7.5	dg/md/me [ part] deposition of Randy Nilles 10-1; 2-6:47 (7.5 due to some nonworking breaks)
3/11/2015	MD	0.5	md reviewing documents and potential exhibits for Nilles Deposition and send them to TSG 0.5
3/11/2015	JP	0.8	JP/MR investigate Def produced organizational charts .6, note numerous corrupted files .2
3/11/2015	ME	0.3	searched documents to prepare for deposition
3/11/2015	AG	0.3	Produce documents to Court reporter TSG (uploading of Exhibits for Deposition of Kelly)
3/11/2015	ME	0.4	me/jp - meeting to discuss process of tracking of client responses to questions for discovery demand
3/11/2015	CM	0.1	JP/CM discuss question re handling of docs produced by def (.1)
3/11/2015	DG	8.4	prepare for deposition by reviewing possible exhibits .5; edits to outline of subjects for questioning .4; dg/md/me [ part] deposition of Randy Nilles 10-1; 2-6:47 (7.5 due to some nonworking breaks)
3/11/2015	MR	0.1	email reply to attys about ESI 30b6 continuation email to Def
3/11/2015	JP	0.1	JP/CM discuss question re handling of docs produced by def (.1)
3/11/2015	MR	0.8	JP/MR investigate Def produced organizational charts .6, note numerous corrupted files .2
3/11/2015	MR	1.3	perform OCR on [client] doc production
3/11/2015	MD	0.6	md reviewing and gathering documents for Chris Kelly deposition 0.6
3/11/2015	ME	5.2	sit in on deposition
3/12/2015	MD	7	md/dg taking deposition of Chris Kelly 7.0
3/12/2015	DG	0.5	dg/jp/md/mr discuss questions and docs to present at deposition in light of first half testimony .5
3/12/2015	MR	0.3	mr/md/dg digest deposition of Chris Kelly 0.5 (mr 0.3)
3/12/2015	MD	0.5	mr/md/dg digest deposition of Chris Kelly 0.5 (mr 0.3)
3/12/2015	MR	0.5	dg/jp/md/mr discuss questions and docs to present at deposition in light of first half testimony .5
3/12/2015	MD	0.5	dg/jp/md/mr discuss questions and docs to present at deposition in light of first half testimony .5
3/12/2015	DG	0.5	mr/md/dg digest deposition of Chris Kelly 0.5 (mr 0.3)
3/12/2015	JP	0.5	dg/jp/md/mr discuss questions and docs to present at deposition in light of first half testimony .5

Date	Staff	Amount of Time	Description
3/12/2015	ME	3.7	searched emails and attached spreadsheets to produce as exhibits for JK deposition
3/12/2015	MR	0.3	JK/MR assist with DT search results in excel filtered tables
3/12/2015	ME	0.2	Scan and email documents for deposition
3/12/2015	AN	0.2	Scan and email documents for deposition
3/12/2015	DG	7	md/dg taking deposition of Chris Kelly [with breaks during which discussed questions with MD] 7.0
3/12/2015	ME	2.7	searched emails and attached spreadsheets for documents to be produced for CK deposition
3/13/2015	DG	0.3	read def reply brf to 50 depositions sought by def .3
3/13/2015	CLER	0.2	PCF client status on case (confirmed current contact information)
3/13/2015	DG	5.3	second seat deposition Jim Kaminsky 10-1; 1:45-4 5.3 (prep w MD during breaks)
3/13/2015	MD	1	md prepare for kaminski deposition 1.0
3/13/2015	MD	6.5	md take deposition of Kaminski 6.5
3/13/2015	DG	0.5	md/dg/jp discussing kaminski deposition and additional testimony needed 0.5
3/13/2015	JP	0.5	md/dg/jp discussing kaminski deposition and additional testimony needed 0.5
3/13/2015	MD	0.5	md/dg/jp discussing kaminski deposition and additional testimony needed 0.5
3/13/2015	ME	0.2	proof read email asking clients to submit documents to be produced
3/13/2015	ME	0.3	printing and organizing documents for JK deposition
3/16/2015	ME	0.1	organized emails re case
3/16/2015	ME	0.5	resent produced documents to defense that were lost due to water damage at their office
3/16/2015	ME	0.5	renamed, for ease of filing, produced documents to be sent to defense that were lost due to water damage at their office
3/16/2015	ME	0.5	ME/JP meeting re answers to questions to be produced
3/16/2015	ME	0	ME/JP meeting to discuss me's assignment to create a checklist of produced documents
3/16/2015	ME	0.7	create checklist to determine what client documents have not yet been produced
3/16/2015	ME	0.6	ME/JP meeting to discuss me's assignment to create a checklist of produced documents
3/16/2015	ME	0.5	digitized handwritten questions response from client
3/16/2015	ME	0.8	ME/JP meeting to discuss next step of assignment re tracking produced/unproduced client documents
3/16/2015	ME	1	verify documents that need to be produced to def
3/16/2015	ME	0.1	review and organize email
3/16/2015	ME	0.1	email to JP re assignment (email to clients asking to submit documents)
3/16/2015	ME	0.5	create spreadsheet of produced answers to Rogs
3/16/2015	CLER	0.1	create PDF Format of document recd client (TM/RSR questions, H. Pellegrino)
3/16/2015	MD	0.1	md respond to email from defense re lost documents 0.1
3/17/2015	ME	0.1	review and organize emails
3/17/2015	ME	0.5	prepare answers to interrogatories for production
3/17/2015	ME	0.4	ME/JP meeting re client questions
3/17/2015	ME	0.1	review email
3/17/2015	ME	0.1	email answers to interrogatories to client for their review
3/17/2015	ME	0.5	compile questions re the digitization of questions
3/17/2015	ME	3	review background information regarding client responses to questions in order to prepare to take the lead on inputting, tracking, and producing future questions



Date	Staff	Amount of Time	Description
3/17/2015	ME	0.1	entered 3 answers to interrogatories that were produced today into tracking spreadsheet
3/17/2015	ME	0.6	JP/ME - meet to discuss answers to interrogatories and file organization
3/17/2015	ME	0.2	Phone call to client
3/17/2015	ME	0.2	prepare answers to interrogatories to send to client for review
3/17/2015	ME	0.3	digitize handwritten questions
3/18/2015	MD	0.1	ME/MD discuss process of downloading and filing produced documents from def
3/18/2015	ME	0.2	ME/AN file dep transcripts in file cabinet
3/18/2015	JK	0.7	JK/MR(0.4) DTsearch for dep email records
3/18/2015	ME	0.1	ME/MD discuss process of downloading and filing produced documents from def
3/18/2015	MD	0.2	md/dg/me/jp meeting about clawback 0.2
3/18/2015	DG	0.1	DG/JP/MD/ME mtg re def clawback of atty/cl document
3/18/2015	ME	0.2	download documents produced by def
3/18/2015	AN	0.2	ME/AN file dep transcripts in file cabinet
3/18/2015	MR	0.4	JK/MR(0.4) DTsearch for dep email records
3/18/2015	ME	0.1	dg/jp/me mtg re def clawback of atty/cl document .1
3/18/2015	JP	0.1	dg/jp/me mtg re def clawback of atty/cl document .1
3/18/2015	ME	0.1	DG/JP/MD/ME mtg re def clawback of atty/cl document
3/18/2015	DG	0.1	dg/jp/me mtg re def clawback of atty/cl document .1
3/18/2015	MD	0.1	ME/MD discuss filing of depositions
3/18/2015	MD	0.1	DG/JP/MD/ME mtg re def clawback of atty/cl document
3/18/2015	ME	0.2	review notes from last contact with clients re documents that need to be produced in order to follow up with clients
3/18/2015	JP	0.1	DG/JP/MD/ME mtg re def clawback of atty/cl document
3/18/2015	MR	0.2	look up source of deposition file as request by atty MD .1, email info to MD .1
3/18/2015	ME	0.1	ME/MD discuss filing of depositions
3/18/2015	ME	0.2	review defendant's demand re first set of interrogatories
3/18/2015	MD	0.1	md emailing mr about production by defense counsel 0.1
3/18/2015	ME	0.1	update calendar to include team meeting
3/18/2015	ME	0.1	verify that email to client was saved in Time Matters
3/18/2015	JS	0.2	plt [client] called for update
3/18/2015	ME	0.2	reschedule team meeting
3/18/2015	ME	1	verify that we have documents for clients whose documents related to answers to interrogatories have not yet been produced
3/18/2015	ME	0.3	compiled questions to JP regarding tracking clients' answers to interrogatories
3/19/2015	JP	1.1	JP/MR discuss process for identifying and contacting clients who have not yet completed questionnaire for answer to interrogatories and/or who have completed questions, but have not yet submitted documents.
3/19/2015	ME	0.6	JP/MD/ME meeting to discuss case priorities
3/19/2015	MD	0.6	JP/MD/ME meeting to discuss case priorities
3/19/2015	JP	0.6	JP/MD/ME meeting to discuss case priorities
3/19/2015	MD	0.3	md editing email to defense counsel based on waiver 0.3
3/19/2015	ME	1.1	coded clients as excluded in TM for future email regarding answer to interrogatories
3/19/2015	JP	0.6	ME/JP show ME how to access and use questions to clients re answers to interrogatories
3/19/2015	MD	1	md discovery regarding litigation hold letters and writing email to defense counsel about clawback of documents 1.0

Date	Staff	Amount of Time	Description
3/19/2015	ME	0.6	ME/JP/MR discuss process for identifying and contacting clients who have not yet completed questionnaire for answer to interrogatories and/or who have completed questions, but have not yet submitted documents.
3/19/2015	ME	0.6	ME/JP show ME how to access and use questions to clients re answers to interrogatories
3/19/2015	JP	0.3	ME/JP discuss process for identifying and contacting clients who have not yet completed questionnaire for answer to interrogatories and/or who have completed questions, but have not yet submitted documents.
3/19/2015	ME	0.3	ME/JP discuss process for identifying and contacting clients who have not yet completed questionnaire for answer to interrogatories and/or who have completed questions, but have not yet submitted documents.
3/19/2015	CLER	0.1	download and file documents produced by def
3/19/2015	MR	1.1	JP/MR discuss process for identifying and contacting clients who have not yet completed questionnaire for answer to interrogatories and/or who have completed questions, but have not yet submitted documents.
3/20/2015	ME	0.4	JP/ME meet to discuss ME role in indexing and gathering documents for def depositions
3/20/2015	MD	0.1	MD/ME show ME process of downloading and saving dockets
3/20/2015	ME	0.4	Update tracking spreadsheet to include information about 3 answers to interrogatories that were produced this week and 1 that was sent to client to review
3/20/2015	ME	0.1	MD/ME show ME process of downloading and saving dockets
3/20/2015	ME	0.2	view email from court re case activity .1; download and save .1
3/20/2015	ME	1	search indexed PLT documents to prepare for deposition
3/20/2015	ME	0.1	organize emails
3/20/2015	ME	0.2	JP/ME discuss tracking of excluded clients
3/20/2015	JP	0.2	JP/ME discuss tracking of excluded clients
3/20/2015	JP	0.4	JP/ME meet to discuss ME role in indexing and gathering documents for def depositions
3/20/2015	JP	0.4	JP/ME meet to discuss next step for notifying excluded clients
3/20/2015	ME	1.4	review correspondence in TM to determine who needs to be sent notification of exclusion
3/20/2015	ME	0.4	JP/ME meet to discuss next step for notifying excluded clients
3/23/2015	ME	0.1	determine and create list of recipients for email to clients re sending documents for answers to interrogatories
3/23/2015	ME	0.2	MR/ME mtg to discuss changes to answer to interrogatories tracking spreadsheet
3/23/2015	MR	0.2	MR/ME - mtg for MR to show ME how to index def response to plaintiff demands discovery documents
3/23/2015	MR	0.2	MR/ME mtg to discuss changes to answer to interrogatories tracking spreadsheet
3/23/2015	ME	0.3	MD/ME mtg to discuss documents needed for Walmart deposition
3/23/2015	ME	0.4	read 144 P. REPLY TO RESPONSE to [81] MOTION to Certify.pdf for background information about the case
3/23/2015	MD	1	md editing/drafting letter to defense counsel about ESI 1.0
3/23/2015	MD	0.2	md/dg discussing how to make depositions less costly and burdensome, including bringing clients to new Paltz for their depositions 0.2
3/23/2015	ME	1.1	prepare third email with questions for answers to interrogatories to be sent to clients who have not yet responded .1; use excel tracking sheet to determine and create list of recipients 1.00

Date	Staff	Amount of Time	Description
3/23/2015	CLER	0.2	Transfer documents recd from email system to docket file and create file copy(FINAL ASCII from the 3-11-2015 deposition of Mr. Nilles. printable, readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
3/23/2015	DG	0.8	md/dg discussing how to make depositions less costly and burdensome, including bringing clients to New Paltz for their depositions 0.2; review ESI dispute letter with def .3; email to Subit re whether his firm available to help cover depos .3
3/23/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#305 - ORDER denying [290] Defendants' Motion to strike untimely filed consents to sue; signed by Judge Ronald B. Leighton.(DN)
3/23/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#306 - ORDER granting in part and denying in part [300] Defendants' Motion to authorize additional depositions; denying an additional 50 depositions; granting an additional 20 depositions; signed by Judge Ronald B. Leighton.(DN)
3/23/2015	MR	0.1	MR/ME meeting for MR to show ME updated master tracking spreadsheet for answers to interrogatories so that ME can send out answer requests to clients who have not yet responded
3/23/2015	ME	0.6	review PLT documents for Walmart depositions
3/23/2015	MD	0.5	md/mr discussing edits to Kellogg letter regarding ESI 0.5
3/23/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#304 - ORDER denying re [289] Defendants MOTION for Judgment on the Pleadings as to Count IX (Arizona Wage Act); signed by Judge Ronald B. Leighton. (DN)
3/23/2015	ME	0.1	review deposition notice re Walmart
3/23/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#303 - ORDER denying [289] Defendants' Motion for Judgment on the Pleadings; signed by Judge Ronald B. Leighton.(DN)
3/23/2015	MR	0.3	MR/ME - mtg for MR to show ME how to rename def response to plaintiff demands discovery documents using bulk rename utility
3/23/2015	ME	0.1	MR/ME meeting for MR to show ME updated master tracking spreadsheet for answers to interrogatories so that ME can send out answer requests to clients who have not yet responded
3/23/2015	MD	0.4	md reading orders in case 0.4
3/23/2015	ME	0.3	MR/ME - mtg for MR to show ME how to rename def response to plaintiff demands discovery documents using bulk rename utility
3/23/2015	MD	0.1	MD/ME mtg to discuss organization of def Bates docs
3/23/2015	ME	0.5	search indexed documents for to determine which should be used for Walmart deposition
3/23/2015	ME	0.2	MR/ME - mtg for MR to show ME how to index def response to plaintiff demands discovery documents
3/23/2015	ME	0.1	read and organize email re def produced docs and deposition transcripts
3/23/2015	ME	0.1	MD/ME mtg to discuss organization of def Bates docs
3/23/2015	ME	2.2	rename Bates docs for plt discovery received by def for consistent filing
3/23/2015	MD	0.3	MD/ME mtg to discuss documents needed for Walmart deposition
3/24/2015	MA	0.2	call from opt-in DF to discuss case updates
3/24/2015	ME	0.1	MR/ME - mtg to discuss how data was input into answer to interrogatories tracking spreadsheet
3/24/2015	MD	0.1	md email defense counsel about discussion re depositions 0.1

Date	Staff	Amount of Time	Description
3/24/2015	MD	1	md identifying documents needed from depositions 1.0
3/24/2015	ME	0.9	input data from postal questions into answers to interrogatories tracking spreadsheet
3/24/2015	MR	0.1	MR/ME - mtg to discuss how data was input into answer to interrogatories tracking spreadsheet
3/24/2015	ME	0.1	MR/ME discuss answer to interrogatories tracking sheet discrepancies and emails to be sent
3/24/2015	ME	0.9	review answers to interrogatories tracking spreadsheet to better understand where we are in the process of receiving answers and documents from clients in order to step into the lead on the project
3/24/2015	ME	0.1	MR/ME verify that ME has mass email re questions for answers to interrogatories set up correctly
3/24/2015	MR	0.1	MR/ME discuss answer to interrogatories tracking sheet discrepancies and emails to be sent
3/24/2015	MR	0.1	MR/ME verify that ME has mass email re questions for answers to interrogatories set up correctly
3/24/2015	MD	0.2	md editing letter to defense counsel about ESI 0.2
3/24/2015	ME	0.3	created email list of clients who need to send documents re answers to interrogatories
3/24/2015	CLER	0.2	Transfer documents recd from email system to docket file and create file copy(FINAL ASCII from the 3-12-2015 deposition of Mr. Kelly. printable, readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
3/24/2015	ME	0.4	created email list of clients who need to complete questions for answers to interrogatories
3/24/2015	ME	0.7	determine reason for discrepancy in numbers on answers to interrogatories spreadsheet
3/24/2015	MR	0.1	MR/ME discuss discrepancies in answers to interrogatories tracking spreadsheet
3/24/2015	ME	0.2	proof read emails to clients re questions needed to be completed and documents needed for answer to interrogatories
3/24/2015	ME	0.1	read and organize email
3/24/2015	ME	0.1	MR/ME discuss discrepancies in answers to interrogatories tracking spreadsheet
3/25/2015	ME	1.7	jp/me mtg to discuss responding to client questions re withdrawing from suit .6; notifying excluded clients .5; and me's role in tracking client responses to questions and producing documents .6
3/25/2015	ME	0.2	read and organize emails
3/25/2015	DG	0.1	review 8cir OSE case - Actionlink .1
3/25/2015	ME	0.1	send email requesting clients send us their documents in re to answers to interrogatories
3/25/2015	ME	0.1	save email correspondence from 3 clients in TM
3/25/2015	DG	0.2	md/dg preparing for call with defense counsel and issues to address about discovery 0.2
3/25/2015	ME	0.1	prepare list of items to be discussed at next team meeting
3/25/2015	MD	0.2	md/dg preparing for call with defense counsel and issues to address about discovery 0.2
3/25/2015	DG	0.6	md/dg call with defense counsel about variety of discovery issues 0.6
3/25/2015	MD	0.6	md/dg call with defense counsel about variety of discovery issues 0.6

Date	Staff	Amount of Time	Description
3/25/2015	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(FINAL ASCII from the 3-13-2015 deposition of Mr. Kaminski. complimentary printable, readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript)
3/25/2015	JP	1.7	jp/me mtg to discuss responding to client questions re withdrawing from suit .6; notifying excluded clients .5; and me's role in tracking client responses to questions and producing documents .6
3/25/2015	ME	0.5	track and troubleshoot emails that bounced back from mass email sent yesterday re completing questions for answers to interrogatories
3/25/2015	ME	0.5	update answers to interrogatories tracking spreadsheet
3/25/2015	DG	0.2	md/dg discussing how to handle Kellogg's late production of discovery and moving forward with depositions of Kellogg's witnesses0.2
3/25/2015	MD	0.2	md/dg discussing how to handle Kellogg's late production of discovery and moving forward with depositions of Kellogg's witnesses0.2
3/25/2015	ME	0.2	updated excluded clients in TM
3/26/2015	ME	0.2	Phone call with client re answers to interrogatories and case update
3/26/2015	JS	0.2	call from plt [client] re: docs
3/26/2015	ME	0.1	AG/ME mtg for AG to inform ME of process to withdrawal consent to sue
3/26/2015	ME	0.1	tc with client about documents for answers to interrogatories
3/26/2015	ME	0.1	tc with client to discuss documents for answers to interrogatories
3/26/2015	ME	0.1	ma/me discuss responding to clients when they inquire about how we feel a case is looking
3/26/2015	AG	0.1	AG/ME mtg for AG to inform ME of process to withdrawal consent to sue
3/26/2015	ME	2.5	respond to emails from clients re documents for answers to interrogatories
3/26/2015	ME	0.7	updated tracking spreadsheet for answers to interrogatories to track new responses to email re sending documents to us
3/26/2015	ME	0.4	initial review of approximately 50 emails received in response to request to send documents to us for answers to interrogatories
3/26/2015	ME	0.2	tc with client re documents for answers to interrogatories
3/26/2015	ME	0.2	reply to client re question about sending documents to us
3/26/2015	ME	0.2	AG/ME discussion on procedure for filing withdrawal of CTS
3/26/2015	AG	0.2	AG/ME discussion on procedure for filing withdrawal of CTS
3/26/2015	ME	0.3	track and file faxed responses re documents for answers to interrogatories
3/26/2015	ME	0.1	save client email in TM and track in answers to interrogatories spreadsheet
3/26/2015	ME	0.4	review notes from yesterday's meeting with jp to create a list of tasks that need to be done today
3/26/2015	AG	0.1	ECF Filing of NOTICE of Withdrawal of Consent to Sue
3/26/2015	CLER	0.1	create PDF format of document recd from client (M. Fluss - document search confirmation)
3/26/2015	MR	0.1	mr/an/js me discuss saving sent messages from outlook into time matters
3/26/2015	ME	0.1	mr/an/js me discuss saving sent messages from outlook into time matters
3/26/2015	ME	0.1	tc with client about documents for answers to interrogatories
3/26/2015	JS	0.1	mr/an/js me discuss saving sent messages from outlook into time matters
3/26/2015	AN	0.1	mr/an/js me discuss saving sent messages from outlook into time matters
3/26/2015	ME	0.5	organize the approximately 50 emails received from clients regarding documents for answers to interrogatories
3/26/2015	CLER	0.1	create PDF format of document recd from client (T. Randall - document search confirmation)
3/26/2015	ME	0.5	create and email FedEx label to client (took longer than expected due to technical issues with outlook)

Date	Staff	Amount of Time	Description
3/26/2015	ME	0.1	JS/ME discuss obtaining documents from clients
3/26/2015	ME	0.5	save client emails in TM
3/26/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#307 - NOTICE of Withdrawal of Consent to Sue ; filed by Plaintiff Patty Thomas. (Dunn, Matt)
3/27/2015	ME	0.3	tc with client to answer questions about documents for answers to interrogatories
3/27/2015	ME	0.1	review client's answers to interrogatories to determine what documents they need to send us
3/27/2015	CLER	0.2	create PDF format of documents recd from client ([client])
3/27/2015	ME	0.3	respond to client re specific documents needed for answers to interrogatories
3/27/2015	ME	0.2	created and sent shipping label to client
3/27/2015	ME	0.3	create FedEx label and send emailed it and additional info regarding answers to interrogatories to client
3/27/2015	ME	0.1	tc with client re documents for answers to interrogatories
3/27/2015	ME	0.1	jp/me discuss questions that arose from client response re documents for answers to interrogatories
3/27/2015	ME	0.2	verify whether or not we had received a questions from a client who says he already completed the questions for answers to interrogatories
3/27/2015	ME	0.2	draft email to send to client in re to documents needed for answers to interrogatories
3/27/2015	JP	0.2	jp/me mtg to discuss documents to be produced
3/27/2015	JS	0.1	call from plt [client] re: fax confirmation
3/27/2015	ME	0.2	jp/me mtg to discuss documents to be produced
3/27/2015	ME	0.2	save sent emails to clients in time matters
3/27/2015	MR	0.1	mr/me discuss how to verify that a client has completed a questions for answers to interrogatories
3/27/2015	ME	0	jp/me discuss process for amending answers to interrogatories
3/27/2015	ME	0.1	read, organize, save, and track new emails re documents for answers to interrogatories
3/27/2015	ME	0.2	tc with client regarding documents for answers to interrogatories
3/27/2015	CLER	0.1	create PDF format of document recd from client ([client] - document search confirmation)
3/27/2015	ME	0.1	jp/me discuss process for amending answers to interrogatories
3/27/2015	AG	0.2	ag/me discuss process of filing withdrawal of consent to sue
3/27/2015	ME	0.4	read, organize, and save emails from clients re documents for answers to interrogatories .3; track responses .1
3/27/2015	ME	0.1	mr/me discuss how to verify that a client has completed a questions for answers to interrogatories
3/27/2015	JP	0.1	jp/me discuss process for amending answers to interrogatories
3/27/2015	ME	0.1	read and organize internal emails re amending answers to interrogatories
3/27/2015	JP	0.2	jp/me discuss process of amending answers to interrogatories
3/27/2015	MD	0.4	md/mr discuss discovery follow up to 5th and 6th discovery demands 0.4
3/27/2015	ME	0.1	email to client re completing questions for answers to interrogatories
3/27/2015	CLER	0.1	scan client docs
3/27/2015	ME	0.2	respond to client emails re documents for answers to interrogatories
3/27/2015	ME	0.2	tc with client re questions about documents for answers to interrogatories
3/27/2015	ME	0.5	first review of new emails from clients re documents for answers to interrogatories
3/27/2015	CLER	0.1	scan client document



Date	Staff	Amount of Time	Description
3/27/2015	ME	0.2	respond to client email re questions response request
3/27/2015	ME	0.2	tc with client about sending documents for answers to interrogatories
3/27/2015	JP	0.1	jp/me discuss questions that arose from client response re documents for answers to interrogatories
3/27/2015	ME	0.1	determine priority of tasks for the day
3/27/2015	ME	0.2	jp/me discuss process of amending answers to interrogatories
3/27/2015	ME	0.2	tc with client re documents for answers to interrogatories
3/27/2015	MR	0.4	md/mr discuss discovery follow up to 5th and 6th discovery demands 0.4
3/30/2015	MD	0.3	MD/MR initial phone conversation in preparation for meet and confer .1, second phone conversation to Def C .1, third phone conversation to postpone M&C
3/30/2015	ME	0.3	recorded email responses re sending us documents for answers to interrogatories in tracking spreadsheet
3/30/2015	ME	0.1	track faxed responses re documents for answers to interrogatories
3/30/2015	CLER	0.2	create PDF format of documents recd from client
3/30/2015	ME	0.5	filed client documents re answers to interrogatories
3/30/2015	ME	0.2	create and email FedEx label to client for sending us documents re answers to interrogatories
3/30/2015	ME	0.2	verify whether or not a client did complete questions for answers to interrogatories
3/30/2015	ME	0.1	TC with client re faxing documents to us for answers to interrogatories
3/30/2015	ME	0.2	filed hard copies of def depositions
3/30/2015	ME	0.1	tc from client making sure that I received a fax
3/30/2015	ME	1.4	created amended answers to rogs for 30+ clients
3/30/2015	CLER	0.2	create PDF format of documents recd from client
3/30/2015	ME	0.3	mr/me search tracking spreadsheet to determine if client had completed questions for answers to rogs
3/30/2015	CLER	0.2	create PDF format of documents recd from client (performance management forms)
3/30/2015	ME	0.1	tc with client re sending documents to us for answers to interrogatories
3/30/2015	ME	0.1	read, organize, save in time matters, and record in tracking spreadsheet newly received client emails
3/30/2015	ME	0.5	file emailed/faxed/mailed client documents for answers to interrogatories
3/30/2015	ME	0.4	verify whether or not we have received documents from client for answers to interrogatories
3/30/2015	CM	0.1	cm/me discuss call from client who speaks Spanish
3/30/2015	MR	0.3	mr/me search tracking spreadsheet to determine if client had completed questions for answers to rogs
3/30/2015	ME	0.2	save sent emails in time matters
3/30/2015	CLER	0.1	create PDF format of documents recd from client
3/30/2015	ME	0.1	cm/me discuss call from client who speaks Spanish
3/30/2015	ME	0.1	create amended answers to interrogatories for client
3/30/2015	ME	0.1	track faxed responses to email sent re documents for answers to interrogatories
3/30/2015	CLER	0.1	create PDF format of document recd from client (document confirmation search [client])
3/30/2015	MR	0.3	prep for Kellogg meet and confer, including scanning MD notes .3
3/30/2015	ME	0.4	organize emails re documents for answers to rogs and save them in time matters

Date	Staff	Amount of Time	Description
3/30/2015	ME	0.2	Initial review of approximately 30 emails from clients re documents for answers to interrogatories
3/30/2015	CLER	0.1	create PDF format of documents recd from client
3/30/2015	ME	0.1	tc with client about documents for interrogatories
3/30/2015	ME	0.1	respond via email to client's question about having already completed the questions for answers to interrogatories
3/30/2015	MR	0.3	MD/MR initial phone conversation in preparation for meet and confer .1, second phone conversation to Def C .1, third phone conversation to postpone M&C
3/30/2015	JS	0.3	plt [client] called re: discovery issues, .2; poss new case intake information, .1
3/30/2015	MR	0.1	make follow-up call to Def Counsel to postpone m&c until later today
3/30/2015	ME	0	tc with client re documents for answers to interrogatories
3/30/2015	CLER	0.1	create PDF format of document recd from client ( document confirmation search)
3/30/2015	ME	0.5	entered faxed and mailed documents into notes section of client's time matters record
3/30/2015	CM	0.3	call from client re documents to send (.2), notes on call (.1)
3/31/2015	ME	1	review client documents sent for answers to interrogatories to determine which need to be redacted before produced
3/31/2015	CLER	0.2	create PDF format of documents recd from client
3/31/2015	ME	0.1	create amended answers to interrogatories for client
3/31/2015	ME	0.5	read .2; organize .1; and track .2 client emails re documents for answers to interrogatories
3/31/2015	ME	0.1	Initial review of emails from clients in response to sending documents to us for answers to interrogatories
3/31/2015	CLER	2.5	Bates stamp client documents for answers to interrogatories
3/31/2015	MR	0.2	discuss pending answers to interrogatories to be produced
3/31/2015	ME	0.9	Bates stamping client documents re answers to interrogatories
3/31/2015	ME	0.1	tc with client re blank fax we received
3/31/2015	ME	0.1	file digital copies of client docs re answers to interrogatories received by fax
3/31/2015	CLER	0.1	file clients' digital documents
3/31/2015	ME	0.7	respond to client emails re documents for answers to interrogatories
3/31/2015	ME	0.2	tc with client re documents for answers to interrogatories .1; notes re call .1
3/31/2015	CLER	0.1	create PDF format of document recd from client (docs search confirmation)
3/31/2015	ME	0.2	discuss pending answers to interrogatories to be produced
3/31/2015	MR	3.7	work on three sets of questionnaire responses to convert into Rogs Answers 3.0, configure on Rog Answer set to be sent out to respondents .7
3/31/2015	ME	0.1	tc from client re documents for answers to interrogatories
3/31/2015	ME	0.1	save client emails re amended answers to interrogatories o the office network files
3/31/2015	ME	0.1	entered received faxes into client notes in time matters
3/31/2015	ME	0.1	respond to client email re documents for answers to interrogatories
3/31/2015	ME	0.2	create amended answers to interrogatories for 4 clients
4/1/2015	CLER	0.1	file client docs re answers to interrogatories that were received via email
4/1/2015	ME	0.3	record which documents need to be submitted to us for approximately 10 clients in the tracking spreadsheet for answers to interrogatories
4/1/2015	ME	0.1	tc with client about documents for answers to interrogatories
4/1/2015	MR	1.7	process questions & responses in preparation of conversion into Rog Answers
4/1/2015	ME	0.3	save amended answers to interrogatories as pdfs so that they can be produced to def

Date	Staff	Amount of Time	Description
4/1/2015	MR	0.1	MR/ME discuss email that went out to plts who need to review their answers to interrogatories before producing to def
4/1/2015	ME	0.1	record 3 newly received questions responses as "complete" in tracking spreadsheet
4/1/2015	ME	0.2	respond via email to client question re which documents need to be sent re answers to interrogatories
4/1/2015	ME	0.1	email to client confirming receipt of documents for answers to interrogatories
4/1/2015	MR	0.1	email to para ME about Kellogg Answers sent to plaintiffs
4/1/2015	CLER	0.3	Bates stamp client documents for answers to interrogatories
4/1/2015	ME	0.1	review client docs re answers to interrogatories
4/1/2015	CLER	0.3	redact .1; and Bates stamp client documents for answers to interrogatories .2
4/1/2015	ME	0.4	respond to client emails re documents for answers to interrogatories
4/1/2015	ME	0.2	create FedEx label for client .1; email to client .1
4/1/2015	ME	0.3	export and save questionnaire responses from questions #3 re answers to interrogatories
4/1/2015	ME	0.2	tc with client re questions about sending documents for answers to interrogatories .1; record notes .1
4/1/2015	CLER	0.3	organized/create PDF format of documents recd from client ([client])
4/1/2015	CLER	0.3	create PDF format of documents recd from client ([client])
4/1/2015	ME	0.1	record received faxed and mailed documents from clients in Time Matters
4/1/2015	ME	0.3	begin determining who needs to be sent a paper questions in the mail for answers to interrogatories
4/1/2015	CLER	0.2	review and file client docs for answers to interrogatories that were received by fax
4/1/2015	ME	0.2	read .1; organize, save, and track emails .1
4/1/2015	ME	0.5	review background information about discovery for the case
4/1/2015	ME	0.2	create amended answers to interrogatories for 2 clients
4/2/2015	ME	0.2	create FedEx label .1; and email to client [client] to send documents for answers to interrogatories .1
4/2/2015	AN	0.1	Telephone message regarding Kellogg case update
4/2/2015	ME	0.2	MR/ME discuss excluded clients who might still be covered by state SOL .1; discuss process of entering new questions answers into tracking spreadsheet .1
4/2/2015	ME	0.1	update mailing address in Time Matters for client [client]
4/2/2015	ME	0.1	read new emails from clients [client] and [client], save, and track
4/2/2015	ME	0.1	Bates stamp documents re answers to interrogatories for client [client]
4/2/2015	MR	1	create question 3 Answers to Rogs
4/2/2015	ME	1.4	prepare documents re answers to interrogatories for production to def
4/2/2015			Transfer documents recd from ECF system to docket file and create file copy(FINAL ASCII from the 3-10-2015 deposition of Ms. Pennington. readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
4/2/2015	CLER	0.2	
4/2/2015	ME	0.2	create FedEx label .1; and email to client YG .1
4/2/2015	ME	0.4	Bates stamp documents re answers to interrogatories for clients [client][client][client][client][client]
4/2/2015	ME	0.2	tc w/ client [client] to give case update .1; notes about the call .1
4/2/2015	ME	0.1	read new email from client [client] re documents for answers to interrogatories, saved, and tracked
4/2/2015	ME	0.1	tc with client [client] about documents for answers to interrogatories
4/2/2015	ME	0.3	read client emails re documents for answers to interrogatories .1; save in Time Matters and track on spreadsheet for answers to interrogatories .2

Date	Staff	Amount of Time	Description
4/2/2015	CLER	1.9	Bates stamp client [client] documents for discovery
4/2/2015	ME	0.2	track and review documents from client [client] re answers to interrogatories
4/2/2015	ME	1.5	prepare amended answers to interrogatories for production by verifying that the form had been completed correctly 1.0 and tracking in spreadsheet .5
4/2/2015	CLER	0.3	create PDF format of documents recd from client
4/2/2015	ME	0.1	create amended answers to interrogatories for client [client]
4/2/2015	MR	0.2	MR/ME discuss excluded clients who might still be covered by state SOL .1; discuss process of entering new questions answers into tracking spreadsheet .1
4/2/2015	ME	0.2	review and Bates stamp documents re answers to interrogatories for client [client]
4/2/2015	ME	0.3	review recently received documents re answers to interrogatories for clients EH, CC, CK, KM, and JN
4/3/2015	ME	0.2	respond to client [client] and [client] emails re documents for answers to interrogatories
4/3/2015	ME	0.6	scan and track received (via fax and postal mail) client documents for answers to interrogatories
4/3/2015	ME	0.2	discuss the process for producing documents to def
4/3/2015	ME	0.2	MA/ME discuss the process for producing documents to def
4/3/2015	AN	0.1	Telephone Call
4/3/2015	MA	0.2	MA/ME discuss the process for producing documents to def
4/3/2015	ME	2	review and prepare documents for production
4/3/2015	ME	0.6	review client docs re answers to interrogatories
4/3/2015	CLER	0.1	scan client [client] documents re answers to interrogatories
4/3/2015	MR	0.1	ME/MR discuss status of question 3 response processing
4/3/2015	ME	0.5	prepare plt documents for production
4/3/2015	ME	0.1	ME/MR discuss status of question 3 response processing
4/6/2015	ME	0.8	review clients [client][client][client][client][client] and [client] docs re answers to interrogatories
4/6/2015	ME	0.1	organize client docs re answers to interrogatories
4/6/2015	ME	0.1	review tracking spreadsheet to determine how many clients have responded to request to send documents for answers to interrogatories
4/6/2015	CLER	0.5	create PDF format of documents recd from Client
4/6/2015	ME	0.5	save emails to clients re reviewing answers to interrogatories in time matters
4/6/2015	CLER	0.3	create PDF format of documents recd from Client
4/6/2015	ME	0.1	download def produced documents
4/6/2015	CLER	0.1	create PDF format of document recd from Client (docs search confirmation)
4/6/2015	ME	0.5	prepare letters to be sent to clients [client][client][client][client] re third request to complete questions for answers to interrogatories
4/6/2015	ME	0.1	create amended answer to interrogatories for clients [client] and [client]
4/6/2015	CLER	0.1	Bates stamp client [client] docs re answers to interrogatories
4/6/2015	ME	0.2	save and track documents for answers to interrogatories received by mail from clients [client] and [client]
4/6/2015	MD	0.1	md responding to dg about document request 0.1
4/6/2015	CLER	0.2	create PDF format of documents recd from Client
4/6/2015	CLER	0.2	create PDF format of documents recd from Client
4/6/2015	CLER	0.1	organize documents re answers to interrogatories that were produced last week
4/6/2015	CLER	0.1	Bates stamp client [client] docs re answers to interrogatories
4/6/2015	ME	0.2	review newly received client docs
4/6/2015	ME	0.1	track documents for answers to interrogatories that were produced last week

Date	Staff	Amount of Time	Description
4/6/2015	ME	0.2	save client documents for answers to interrogatories that were received via postal mail and fax for clients [client][client][client]
4/6/2015	CLER	0.3	create PDF format of documents recd from Client
4/6/2015	ME	0.1	create amended answer to interrogatories for client [client]
4/6/2015	CLER	0.5	create PDF format of documents recd from Client
4/6/2015	ME	0.5	Bates stamp documents re answers to interrogatories for clients [client][client] and [client]
4/6/2015	ME	0.1	review .1 client [client] documents re answers to interrogatories
4/6/2015	CLER	0.2	create PDF format of documents recd from Client
4/6/2015	ME	0.1	tc w/ client [client] for case update
4/6/2015	ME	1.1	rename downloaded documents produced by def to match filing system
4/6/2015	ME	0.4	review .1; track .1; save in time matters .1; and organize .1; emails from clients [client][client][client][client] re documents for answers to interrogatories
4/6/2015	ME	0.3	save newly received documents for answers to interrogatories
4/6/2015	ME	1	produce amended answers to interrogatories
4/6/2015	ME	0.1	tc with client [client] for case update
4/6/2015	ME	0.1	save and track mailed client [client] docs re answers to interrogatories
4/7/2015	ME	0.2	review client [client] documents for answers to interrogatories
4/7/2015	ME	0.1	save client [client] documents for answers to interrogatories
4/7/2015	MD	0.3	dg/md discuss deposition scheduling and how to pressure Jim to set deposition dates .3
4/7/2015	ME	0	download documents produced by def .1
4/7/2015	ME	0.4	verify any inconsistencies in answers from duplicate questions for answers to interrogatories
4/7/2015	ME	0.1	save client [client] documents for answers to interrogatories
4/7/2015	ME	0.3	rename documents produced by defense to be consistent with other files
4/7/2015	DG	0.3	dg/md discuss deposition scheduling and how to pressure Jim to set deposition dates .3
4/7/2015	CLER	0.3	Bates stamp client [client]C documents for answers to interrogatories
4/7/2015	ME	0.2	review documents produced by def for client [client]
4/7/2015	CLER	0.3	create PDF format of documents recd from Client
4/7/2015	ME	0.1	review client [client] documents for answers to interrogatories
4/7/2015	MR	0.4	prep for emailing question 3 Rog Answers to respondents .3, email to paras ME and JP about duplicate questions responses .1
4/7/2015	ME	0.2	redact privileged information in documents to produce re answers to interrogatories for client [client]
4/7/2015	CLER	0.2	create PDF format of documents recd from Client
4/7/2015	CLER	1.1	Bates stamp client [client], [client] and [client] documents for answers to interrogatories
4/7/2015	ME	0.2	read and respond to clients ER, EP, [client] emails re documents for answers to interrogatories
4/7/2015	ME	0.2	file newly received documents for answers to interrogatories from clients [client] and [client].1; and track in spreadsheet .1
4/7/2015	ME	1.1	review client documents for answers to interrogatories to determine which are ready to be produced to def
4/7/2015	ME	0.2	reply to client [client] email re documents for answers to interrogatories
4/7/2015	ME	0.4	review answers to interrogatories to verify that excluded clients did not complete
4/7/2015	ME	0.2	review client [client] documents for answers to interrogatories
4/8/2015	DG	1	annotate Christopher v Smithkline arguments re OSE 1

Date	Staff	Amount of Time	Description
4/8/2015	CLER	0.4	create PDF format of documents recd from Client
4/8/2015	ME	0.6	rename documents produced by defense to be consistent with other files
4/8/2015	ME	0.6	JLP/ME meet to discuss status of PLT production .2; and tasks needed to be done re PLT production .3
4/8/2015	ME	1.5	md/dg/mr/me litigation team meeting to discuss def depositions .2; structure of summary judgement brief .4; discovery needed .5, motions needed .2, and status of PLT production .2
4/8/2015	JP	0.6	JLP/ME meet to discuss status of PLT production .2; and tasks needed to be done re PLT production .3
4/8/2015	MR	0.3	MR/ME meet to discuss alternative ways to name client documents for efficiency
4/8/2015	ME	1.1	organize client documents responsive to rogs
4/8/2015	ME	0.3	MR/ME meet to discuss alternative ways to name client documents for efficiency
4/8/2015	CLER	0.3	create PDF format of documents recd from Client
4/8/2015	JP	1	jlp/md/dg/mr/me litigation team meeting to discuss def depositions .2; structure of summary judgement brief .3; discovery needed .3; motions needed 2.
4/8/2015	JP	0.7	JLP/MR/ME meet to discuss organization and tracking of client documents
4/8/2015	MR	0.7	JLP/MR/ME meet to discuss organization and tracking of client documents
4/8/2015	ME	0.3	organize produced documents responsive to rogs
4/8/2015	DG	1.5	md/dg/mr/me litigation team meeting to discuss def depositions .2; structure of summary judgement brief .4; discovery needed .5, motions needed .2, and status of PLT production .2
4/8/2015	MD	1.5	md/dg/mr/me litigation team meeting to discuss def depositions .2; structure of summary judgement brief .4; discovery needed .5, motions needed .2, and status of PLT production .2
4/8/2015	MR	1.5	md/dg/mr/me litigation team meeting to discuss def depositions .2; structure of summary judgement brief .4; discovery needed .5, motions needed .2, and status of PLT production .2
4/8/2015	MD	0.3	md prepare for meeting re case updates 0.3
4/8/2015	CLER	0.2	create PDF format of documents recd from Client
4/8/2015	ME	0.7	JLP/MR/ME meet to discuss organization and tracking of client documents
4/9/2015	MD	0.5	md review Kellogg's discovery production 0.5
4/9/2015	CLER	0.8	organize documents that were produced to def re answers to rogs
4/9/2015	ME	0.1	download and save documents produced by def
4/9/2015	CLER	0.1	file hard copies of DEF AP deposition
4/9/2015	ME	0.4	Bates stamp plt [client][client] and [client] documents responsive to rogs
4/9/2015	CLER	0.1	create PDF format of documents recd from (Client (route responsibilities)
4/9/2015	ME	0.2	review draft letter to plts excluded because of SOL
4/9/2015	ME	0.3	organize produced amended answers to rogs
4/9/2015	JP	1.8	review defendants docs for proof issues
4/9/2015	MR	0.1	email read and reply to para JP about meaning of Kellogg acronym
4/9/2015	CLER	0.1	create PDF format of documents recd from Client
4/9/2015	ME	0.1	dg/md/mr/me meeting to discuss filing of documents produced by def that only have Bates numbers in titles rather than within the document itself
4/9/2015	DG	1.4	dg/md/mr/me meeting to discuss filing of documents produced by def that only have Bates numbers in titles rather than within the document itself .1; legal research re OSE 1.3
4/9/2015	ME	0.7	file mailed PLT [client] and [client] documents for answers to interrogatories



Date	Staff	Amount of Time	Description
4/9/2015	MR	0.1	dg/md/mr/me meeting to discuss filing of documents produced by def that only have Bates numbers in titles rather than within the document itself
4/9/2015	MD	0.1	dg/md/mr/me meeting to discuss filing of documents produced by def that only have Bates numbers in titles rather than within the document itself
4/9/2015	ME	0.1	organize emails in inbox
4/9/2015	CLER	0.4	create PDF format of documents recd from Client
4/9/2015	CLER	0.3	file client [client][client][client][client][client] received by postal mail and fax .2; track in spreadsheet .1
4/9/2015	ME	0.1	remove duplicate questions re answers to rogs from group of questions ready to be sent to clients for review
4/9/2015	CLER	0.1	create PDF format of documents recd from Client (ads/sales)
4/9/2015	ME	0.1	email to MD re documents produced by Kellogg
4/9/2015	CLER	0.1	create PDF format of documents recd from Client (work with forms)
4/9/2015	ME	0.5	draft email to PLT [client] who responded to questions for rogs twice
4/9/2015	ME	0.1	rename docs produced by def to be consistent with our filing system
4/9/2015	ME	0.2	create amended answers to rogs for clients [client] and [client]
4/9/2015	ME	0.3	draft general email to PLTs who answered the questions for rogs twice
4/9/2015	CLER	0.1	create PDF format of documents recd from Client (hours worked at home)
4/9/2015	CLER	0.2	create PDF format of documents recd from Client
4/9/2015	ME	0.2	review document titles produced by def to determine document type
4/9/2015	ME	0.1	tc with client [client] for case update
4/9/2015	JP	1.1	review additional documents re bonus for other titles re sales exemption issues
4/10/2015	ME	0.1	save faxed documents re answers to interrogatories for client [client]
4/10/2015	ME	0.1	tc with client [client] about documents for rogs
4/10/2015	ME	0.2	review newly received client documents re answers to interrogatories
4/10/2015	DG	2.2	dg/md discuss next steps to bring case to conclusion - research, discovery, staffing 1; legal research on OSE 1.2
4/10/2015	CLER	0.1	create PDF format of documents recd from Client
4/10/2015	ME	0.2	save and track emails from clients [client][client] and [client] re documents for answers to interrogatories
4/10/2015	MR	0.3	MR/ME discuss information needed for discovery
4/10/2015	ME	0.5	prepare answers to interrogatories for production
4/10/2015	ME	0.1	produce answers to interrogatories
4/10/2015	MR	0.2	viewed first few minutes of safety video produced by Def .1, email to attys/para regarding video .1
4/10/2015	CLER	0.1	create PDF format of documents recd from Client
4/10/2015	ME	0.1	listen to vm from client [client]
4/10/2015	MR	0.2	watch full video on safety received from Def .1, send email to attys/para commenting on safety video .1
4/10/2015	MR	0.3	MR/ME discuss process of using sendthisfile plugin to produce documents to def
4/10/2015	ME	0.3	MR/ME discuss process of using sendthisfile plugin to produce documents to def
4/10/2015	ME	0.1	respond to client [client] email re documents for answers to interrogatories
4/10/2015	CLER	1.2	file hard copies of client documents for answers to interrogatories
4/10/2015	ME	0.1	save emailed client [client][client][client] documents for answers to interrogatories
4/10/2015	MD	0.1	md email Misty re documents needed to help prove claims 0.1
4/10/2015	ME	0.3	MR/ME discuss information needed for discovery

Date	Staff	Amount of Time	Description
4/10/2015	CLER	0.8	Bates stamp client documents re answers to interrogatories
4/10/2015	ME	0.1	organize rogs documents produced to def
4/10/2015	MD	1	dg/md discuss next steps to bring case to conclusion - research, discovery, staffing 1
4/10/2015	ME	0.2	draft amended answers to rogs for client [client]
4/10/2015	MD	0.2	md write and send email to defense counsel about discovery needed for deposition 0.2
4/13/2015	ME	0.1	email to MD re draft letter to PLTs excluded based on SOL
4/13/2015	ME	0.1	JLP/ME discuss draft of letter to plts excluded based on SOL
4/13/2015	MR	0.4	email notes on Def list of training videos previously identified .1, perform dtsearch on keyword to find other safety/training video references .3
4/13/2015	CLER	0.2	create PDF format of documents recd from client
4/13/2015	DG	0.3	dg/mr discuss use of BLS statistics to show plaintiffs are blue collar .3
4/13/2015	MR	0.3	dg/mr discuss use of BLS statistics to show plaintiffs are blue collar .3
4/13/2015	ME	0.1	draft amended answer to rogs for plt [client]
4/13/2015	JP	0.1	JLP/ME discuss draft of letter to plts excluded based on SOL
4/13/2015	MR	0.1	reply to email from para JP about list of training videos
4/13/2015			draft outline of points to prove nonexempt under OSE 2.5; legal research re OSE for same
	DG	3.8	1; email to counsel in Christopher for DOL reports mentioned in decision .3
4/13/2015	ME	0.1	file faxed document from client [client]
4/13/2015	ME	1.5	search documents produced by def for discovery information
4/13/2015			conduct legal research (Dept. of Labor, Wage and Hour Division, Report and Recommendations of the Presiding Officer at Hearings Preliminary to Redefinition (1940) (1940 Report)/Dept. of Labor, Wage and Hour Division, Report and Recommendations on Proposed Revisions of Regulations, Part 541, p. 82 (1949) (1949 Report))
	AG	2.1	
4/13/2015	CLER	0.2	create PDF format of documents recd from client
4/13/2015	ME	1	draft letter to PLTs excluded based on SOL
4/13/2015	CLER	2.2	organize documents produced to def
4/14/2015	ME	0.3	file newly received mailed documents for answers to rogs from clients [client][client][client][client] .1; and track in spreadsheet .2
4/14/2015	DG	0.2	review outline of OSE issues .2
4/14/2015	ME	0.1	review documents produced by def for discovery
4/14/2015	CLER	0.7	file documents produced by def for discovery
4/14/2015	ME	0.8	review client [client][client][client] and [client] documents for answers to rogs
4/14/2015	ME	0.1	return call to plt [client] for case update
4/14/2015	DG	0.1	circulate proof chart re OSE and issues for discovery .1
4/14/2015	ME	0.1	receive vm from plt [client]
4/15/2015	JP	0.1	JLP/ME meet to discuss assignment priorities
4/15/2015	ME	0.9	search plt documents for discovery information
4/15/2015	ME	0.1	file and track plt FG documents received for answers to rogs
4/15/2015	MD	0.2	corresponding with defense counsel about documents for deposition 0.2
4/15/2015			JLP/MD/DG/MR/ME team meeting to discuss use of outline for final discovery .2; discuss OSE exemption regarding white collar v. blue collar work .3; discuss process for describing primary job duty .3; plan next meeting .1
	DG	0.9	
4/15/2015			JLP/MD/DG/MR/ME team meeting to discuss use of outline for final discovery .2; discuss OSE exemption regarding white collar v. blue collar work .3; discuss process for describing primary job duty .3
	MD	0.8	

Date	Staff	Amount of Time	Description
4/15/2015	MR	0.9	JLP/MD/DG/MR/ME team meeting to discuss use of outline for final discovery .2; discuss OSE exemption regarding white collar v. blue collar work .3; discuss process for describing primary job duty .3; plan next meeting .1
4/15/2015	JP	0.9	JLP/MD/DG/MR/ME team meeting to discuss use of outline for final discovery .2; discuss OSE exemption regarding white collar v. blue collar work .3; discuss process for describing primary job duty .3; plan next meeting .1
4/15/2015	JS	0.1	js/mr discuss uses of navigation pane in MS Word
4/15/2015	MR	0.1	js/mr discuss uses of navigation pane in MS Word
4/15/2015	DG	0.3	outline OSE proof issues for Morning Foods .3
4/15/2015	ME	0.3	review outline re discovery needed
4/15/2015	ME	0.6	search def documents for discovery information
4/15/2015	CLER	0.2	create PDF format of documents recd from client
4/15/2015	ME	0.1	emailing plt DD re documents for answers to interrogatories
4/15/2015	ME	0.9	JLP/MD/DG/MR/ME team meeting to discuss use of outline for final discovery .2; discuss OSE exemption regarding white collar v. blue collar work .3; discuss process for describing primary job duty .3; plan next meeting .1
4/15/2015	ME	0.1	JLP/ME meet to discuss assignment priorities
4/16/2015	ME	0.5	prepare PLT-AB docs re answers to rogs for Bates stamping: convert to pdf .2; redact privileged information .2; save attachments .1
4/16/2015	ME	0.2	review def answer to complaint to better understand background information
4/16/2015	ME	0.1	review priority of tasks to complete
4/16/2015	ME	1.2	organize docs produced by plt
4/16/2015	ME	0.2	Bates stamp PLT-[client] docs for answers to interrogatories
4/16/2015	JP	0.3	client called to discuss exclusion from lawsuit
4/16/2015	ME	0.1	email draft letters re answers to rogs for JLP to review
4/16/2015	ME	0.1	review email links re [client] job classifications
4/16/2015	ME	0.2	emailing JPL about document organization for PLT answers to rogs
4/16/2015	ME	0.2	draft letter to people who need to send docs for answers to rogs
4/16/2015	ME	0.2	determine who needs to be sent notice to send docs for answers to rogs
4/16/2015	ME	0.2	update draft letter to people who need to complete questions for answers to rogs
4/16/2015	JP	0.1	JLP/ME discuss process for obtaining readable documents from plts who faxed documents that cannot be read clearly
4/16/2015	MD	0.5	md reviewing Kellogg discovery production, including Walmart contracts 0.5
4/16/2015	ME	0.2	determine who needs to be sent a third notice to complete questions for rogs
4/16/2015	AG	0.2	Arrange Deposition To Defendants Pursuant To Rule 30(B)(1)
4/16/2015	ME	0.4	prepare PLT-[client] docs re answers to rogs for Bates stamping: convert to pdf .2; save attachments .2
4/16/2015	ME	0.7	prepare PLT-[client] docs re answers to rogs for Bates stamping: convert to pdf .3; redact privileged information .3; save attachments .1
4/16/2015	ME	0.2	determine best way to organize produced documents so that they can be indexed
4/16/2015	ME	0.1	JLP/ME discuss process for obtaining readable documents from plts who faxed documents that cannot be read clearly
4/16/2015	ME	0.2	emailing PLT [client] re resending documents for answers to interrogatories
4/16/2015	ME	0.2	organize emails
4/16/2015	ME	0.3	Bates stamp PLT [client] documents for answers to rogs
4/16/2015	ME	0.1	calendar litigation team brainstorming meeting
4/16/2015	CLER	0.5	organize documents sent by PLTs for answers to interrogatories

Date	Staff	Amount of Time	Description
4/16/2015	ME	0.5	determine correct process for redacting emails in order to maintain consistency
4/16/2015	ME	0.3	prepare PLT-[client] docs re answers to rogs for Bates stamping: convert to pdf .1; redact privileged information .2
4/16/2015	ME	0.1	check questionnaire for new questions responses
4/16/2015	MD	0.5	md outlining for Walmart deposition 0.5
4/16/2015	ME	0.2	download and save documents produced by def
4/16/2015	MD	1	md review documents for Walmart deposition 1.0
4/17/2015	DG	1.4	JLP/MR/MD/DG/ME team meeting to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/17/2015	MR	1.4	JLP/MR/MD/DG/ME team meeting to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/17/2015	MD	1.4	JLP/MR/MD/DG/ME team meeting to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/17/2015	JP	1.4	JLP/MR/MD/DG/ME team meeting to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/17/2015	ME	0.4	review status of answers and documents produced re answers to interrogatories
4/17/2015	MR	0.1	MR/ME discuss sending answers to interrogatories for PLT to review
4/17/2015	ME	0.2	review information for team meeting to describe TM/RSR duties
4/17/2015	ME	0.2	download and save documents produced by def
4/17/2015	ME	0.1	save PLT-[client] and MR documents for answers to rogs
4/17/2015	ME	1	organize PLT produced docs
4/17/2015	ME	0.1	organize internal emails re the case
4/17/2015	ME	0.1	review revised dep notice to def
4/17/2015	ME	0.2	review information related to developing facts for exemption Argument
4/17/2015	ME	0.1	review PLT [client] and MR documents for answers to interrogatories
4/17/2015	ME	0.2	review notes re case facts to gain background information about exemption Argument
4/17/2015	MD	2	drafting deposition outline for Walmart 2.0
4/17/2015	ME	1.4	JLP/MR/MD/DG/ME team meeting to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/17/2015	ME	0.3	review documents produced for discovery by def to prepare for deposition
4/17/2015	MD	1	md reviewing documents for deposition re Walmart 1.0
4/17/2015	ME	0.5	prepare agenda for meeting with JLP on Monday
4/20/2015	ME	0.1	Bates stamp PLT CC documents
4/20/2015	CLER	0.1	create PDF format of correspondence recd from D. (reiterate object to deposition notice)
4/20/2015	ME	0.6	JLP/ME mtg to discuss process of redacting client documents .3; and process of producing client documents that have attachments .3
4/20/2015	MD	0.1	MD/ME discuss preparing documents to send to def for deposition
4/20/2015	DG	0.8	md/dg/jp/me discussing topics to cover during Walmart deposition and how to attack sales issues 0.8
4/20/2015	ME	0.1	JPL/ME discuss process of producing PLT documents
4/20/2015	MD	4.5	md preparing for Wal-Mart Kellogg deposition, creating outline, review documents, send documents to TSG, marking documents for deposition 4.5
4/20/2015	MD	0.8	md/dg/jp/me discussing topics to cover during Walmart deposition and how to attack sales issues 0.8
4/20/2015	DG	0.1	JLP/ME/DG mtg to discuss process of redacting information from PLT documents to be produced to def

Date	Staff	Amount of Time	Description
4/20/2015	ME	0.8	md/dg/jp/me discussing topics to cover during Walmart deposition and how to attack sales issues 0.8
4/20/2015	ME	0.1	tc with PLT [client] re termination date
4/20/2015	JP	0.8	md/dg/jp/me discussing topics to cover during Walmart deposition and how to attack sales issues 0.8
4/20/2015	JP	0.1	JPL/ME discuss process of producing PLT documents
4/20/2015	MD	0.2	MD/ME mtg to discuss exhibit preparation needed for deposition
4/20/2015	MR	0.4	MR/JLP/ME mtg to discuss process of producing PLT documents with attachments
4/20/2015	ME	0.2	MD/ME mtg to discuss exhibit preparation needed for deposition
4/20/2015	ME	0.1	review voicemail from PLT [client]
4/20/2015	ME	0.5	prepare exhibits to be uploaded to def
4/20/2015	ME	0.1	read and organize emails
4/20/2015	ME	0.1	document email responses re answers to interrogatories in tracking spreadsheet
4/20/2015	MR	0.3	dg/mr discuss Robinson Patman Act and its effect on Walmart sales for Kellogg .3
4/20/2015	ME	0.5	locate Bates stamped copies of PLT [client] documents to be used in deposition
4/20/2015	DG	0.3	dg/mr discuss Robinson Patman Act and its effect on Walmart sales for Kellogg .3
4/20/2015	DG	2.6	review documents to prepare for Walmart deposition tomorrow 2.6
4/20/2015	ME	0.1	locate Bates stamped copies of PLT [client] documents to be used in deposition
4/20/2015	ME	0.4	review PLT [client] documents for privileged information to be redacted
4/20/2015	ME	0.2	review deposition outline
4/20/2015	ME	1.5	print exhibits for deposition
4/20/2015	ME	0.1	produce PLT [client] documents to def
4/20/2015	CLER	0.2	Bates stamp client [client] documents
4/20/2015	ME	0.5	search newly received PLT documents for any related to the deposition
4/20/2015	JP	0.6	JLP/ME mtg to discuss process of redacting client documents .3; and process of producing client documents that have attachments .3
4/21/2015	ME	0.1	tc from PLT [client] transferred to paralegal JLP vm
4/21/2015	ME	0.2	reading and organize emails
4/21/2015	ME	0.1	track amended answer to rogs for PLTs [client] and [client]
4/21/2015	JP	0.1	JLP/ME discuss organization of documents sent to us by PLTs
4/21/2015	JP	0.3	JLP/ME mtg to discuss process of reviewing and producing PLT documents
4/21/2015	ME	0.3	JLP/ME mtg to discuss process of reviewing and producing PLT documents
4/21/2015	ME	0.6	DG/JLP/MD/ME mtg to discuss information from Scott Salmon deposition re Walmart
4/21/2015	MD	2.2	deposition of Scott Salmon re Walmart 2.2
4/21/2015	DG	0.6	DG/JLP/MD/ME mtg to discuss information from Scott Salmon deposition re Walmart
4/21/2015	MD	0.6	DG/JLP/MD/ME mtg to discuss information from Scott Salmon deposition re Walmart
4/21/2015	JP	0.6	DG/JLP/MD/ME mtg to discuss information from Scott Salmon deposition re Walmart
4/21/2015	ME	0.2	tc with PLT [client] re amended answers to interrogatories

Date	Staff	Amount of Time	Description
4/21/2015	ME	1	JLP/ME mtg to discuss returning original PLT documents to PLTs .2; when to review docs and where to put documents that support the case .1; issues with amended to answers to interrogatories .3; letters to be sent re answers to interrogatories .1; letter to be sent to excluded PLT .1; paralegal role in reviewing documents .2
4/21/2015	DG	2.2	deposition of Scott Salmon re Walmart 2.2
4/21/2015	ME	0.1	email MD a reminder to review draft email to PLTs who responded to rog questions twice
4/21/2015	ME	0.2	review PLT VB status re answers to interrogatories in order to return call from PLT VB
4/21/2015	DG	5	deposition of Scott Salmon 4; prep during breaks 1
4/21/2015	ME	0.2	review answers to rogs status of PLT [client] to respond to his vm
4/21/2015	MD	5	deposition of Scott Salmon 4; prep during breaks 1
4/21/2015	JP	1	JLP/ME mtg to discuss returning original PLT documents to PLTs .2; when to review docs and where to put documents that support the case .1; issues with amended to answers to interrogatories .3; letters to be sent re answers to interrogatories .1; letter to be sent to excluded PLT .1; paralegal role in reviewing documents .2
4/21/2015	ME	0.1	draft email to [client] re status of rogs
4/21/2015	ME	0.5	determine which documents Kellogg has produced re Walmart and contract agreements for Scott Salmon deposition re Walmart
4/21/2015	ME	0.2	draft amended answer to rog for PLT [client]
4/22/2015	ME	0.7	rename folders of discovery documents produced by opposing counsel so that they are consistent with our filing method
4/22/2015	MR	1.3	JLP/MR/MD/DG/ME team meeting to continue to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/22/2015	MD	1.3	JLP/MR/MD/DG/ME team meeting to continue to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/22/2015	JP	1.3	JLP/MR/MD/DG/ME team meeting to continue to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/22/2015	DG	1.3	JLP/MR/MD/DG/ME team meeting to continue to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/22/2015	JP	0.1	JLP/ME discuss production of PLT [client] documents
4/22/2015	ME	0.1	JLP/ME discuss production of PLT [client] documents
4/22/2015	ME	1.3	JLP/MR/MD/DG/ME team meeting to continue to discuss and describe TM/RSR primary job duties to develop facts for exemption Argument
4/22/2015	ME	0.1	read emails
4/23/2015	JP	0.1	MA/JP discussed how to organize & produce docs received from 800+ plts
4/23/2015	JP	0.1	JLP/ME discuss naming documents to be produced to defense counsel
4/23/2015	MD	0.1	MD/ME discuss when to return original documents to clients
4/23/2015	ME	0.1	MD/ME discuss production of client documents to defense counsel
4/23/2015	ME	0.1	MD/ME discuss when to return original documents to clients
4/23/2015	ME	0.3	review newly received client documents responsive to answer to interrogatories
4/23/2015	ME	0.4	JLP/ME discuss the naming of documents to be produced to defense counsel
4/23/2015	ME	0.1	read email from client in response to request for documents responsive to answer to interrogatories
4/23/2015	MA	0.1	MA/JP discussed how to organize & produce docs received from 800+ plts
4/23/2015	ME	0.1	MD/ME discuss naming documents to be produced to defense counsel
4/23/2015	MD	1	md reviewing and compiling outstanding list of discovery 1.0



Date	Staff	Amount of Time	Description
4/23/2015	ME	0.1	save newly received via postal mail client documents responsive to answer to interrogatories
4/23/2015	JP	0.1	JLP/ME discuss work assignments
4/23/2015	ME	0.1	review letter to defense counsel regarding outstanding discovery
4/23/2015	ME	0.7	redact privileged information from client documents responsive to interrogatories
4/23/2015	JP	0.4	JLP/ME discuss the naming of documents to be produced to defense counsel
4/23/2015	MD	0.1	MD/ME discuss production of client documents to defense counsel
4/23/2015	ME	0.1	JLP/ME discuss work assignments
4/23/2015	ME	0.1	create amended answers to interrogatories for client
4/23/2015	CLER	0.4	Bates stamp client documents responsive to interrogatories
4/23/2015	ME	0.1	document receipt of client amended answers in tracking spreadsheet
4/23/2015	ME	0.5	prepare amended answers to interrogatories for production to opposing counsel
4/23/2015	ME	0.1	save email from client regarding voicemail that was left
4/23/2015	ME	0.1	read internal emails regarding important documents for discovery
4/23/2015	ME	0.1	track newly received via postal mail client documents responsive to answer to interrogatories
4/23/2015	ME	0.1	save client documents that were sent by email for answers to interrogatories
4/23/2015	JS	0.3	case update to unidentified intake
4/23/2015	ME	0.3	verify which clients have requested that their original documents be sent back to them
4/23/2015	CLER	0.3	create PDF format of documents recd from client
4/23/2015	ME	0.1	organize emails
4/23/2015	ME	0.6	review client documents responsive to answer to interrogatories to gain additional knowledge for fact development
4/23/2015	ME	0.1	track client response to request to send documents for answer to interrogatories
4/23/2015	ME	0.1	review newly received client documents in response to answer to interrogatories
4/23/2015	MD	0.1	MD/ME discuss naming documents to be produced to defense counsel
4/23/2015	ME	0.1	JLP/ME discuss naming documents to be produced to defense counsel
4/24/2015	ME	0.4	verify clear and complete scans of original client documents for those who want them sent back
4/24/2015	ME	0.1	review document produced by defense counsel for facts related to exemption Argument
4/24/2015	MA	0.3	MA/ME discuss paralegal role in answering various client questions
4/24/2015	CLER	0.6	Bates stamp client documents to be produced to defense counsel
4/24/2015	ME	0.1	MR/ME discuss history of Kellogg Morning Foods division to better understand client document
4/24/2015	CLER	0.2	scan client documents responsive to rogs
4/24/2015	ME	0.1	email MR to learn method/standard for obtaining documents from client thumb drive
4/24/2015	ME	0.5	redact privileged information from client documents to be produced to defense counsel
4/24/2015	ME	0.3	save client documents produced to defense counsel in appropriate file
4/24/2015	CLER	0.1	file hard copies of client documents responsive to interrogatories
4/24/2015	ME	0.1	read background information about DSD model to increase knowledge of case background

Date	Staff	Amount of Time	Description
4/24/2015	MR	0.1	MR/ME discuss history of Kellogg Morning Foods division to better understand client document
4/24/2015	ME	1.1	review documents produced by defense counsel to increase knowledge of discovery documents
4/24/2015	ME	0.2	MD/ME discuss obtaining documents from client's thumb drive
4/24/2015	ME	0.5	review client documents produced to defense counsel to increase knowledge of case background
4/24/2015	ME	0.1	review documents gathered as facts for exemption Argument
4/24/2015	ME	0.3	MA/ME discuss paralegal role in answering various client questions
4/24/2015	ME	0.2	MD/ME discuss obtaining documents from client's thumb drive
4/24/2015	MR	0.2	MR/ME discuss obtaining documents from client's thumb drive
4/24/2015	ME	0.3	make note in spreadsheet of clients who sent original documents so that we can track whose we have returned
4/24/2015	ME	0.2	MR/ME discuss obtaining documents from client's thumb drive
4/24/2015	ME	0.4	review newly received client documents responsive to interrogatories
4/24/2015	MR	0.1	MR/ME discuss location of client documents on server
4/24/2015	ME	0.5	telephone call with client regarding rogs and general concerns .3; write notes about call .2
4/24/2015	ME	0.1	email to JP asking to return call to client with questions/concerns
4/24/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories to produce to defense counsel
4/24/2015	ME	0.1	MR/ME discuss location of client documents on server
4/27/2015	ME	0.1	review client emails regarding sending us documents for answers to interrogatories
4/27/2015	ME	0.1	email client to answer question regarding documents for answer to interrogatories
4/27/2015	ME	1.6	JLP/MR/ME meeting to discuss location of discovery documents used as proof .3; organizing/tracking of discovery documents used as proof .4; organizing/tracking discovery documents produced by defense counsel .3; organizing/tracking discovery documents produced by plaintiffs .4; plan for moving forward with the tracking/organizing of discovery documents .2
4/27/2015	DG	0.1	review spreadsheet showing chain of command for RSRs .1
4/27/2015	MR	1.2	web research for recent articles about Direct Store Delivery involving Kellogg or industry standards
4/27/2015	ME	0.4	review status of client answers to interrogatories and responsive documents received
4/27/2015	ME	0.1	email to client to answer her question about whether or not we received her questions for her answer to interrogatories
4/27/2015	ME	0.1	move client documents that need JLP's review to new location on server
4/27/2015	CM	0.3	CM/ME discuss process of creating a deposition digest
4/27/2015	ME	0.3	CM/ME discuss process of creating a deposition digest
4/27/2015	MR	1.7	JLP/MR/ME meeting to discuss location of discovery documents used as proof .3; organizing/tracking of discovery documents used as proof .5; organizing/tracking discovery documents produced by defense counsel .3; organizing/tracking discovery documents produced by plaintiffs .4; plan for moving forward with the tracking/organizing of discovery documents .2

Date	Staff	Amount of Time	Description
4/27/2015	JP	1.7	JLP/MR/ME meeting to discuss location of discovery documents used as proof .3; organizing/tracking of discovery documents used as proof .5; organizing/tracking discovery documents produced by defense counsel .3; organizing/tracking discovery documents produced by plaintiffs .4; plan for moving forward with the tracking/organizing of discovery documents .2
4/27/2015	ME	0.1	create updated index of documents produced by defense counsel
4/27/2015	ME	0.2	review documents set aside as facts to support exemption Argument
4/27/2015	ME	0.1	create updated index of client documents
4/27/2015	ME	0.9	JLP/ME meeting to discuss organization and tracking of discovery documents .6; use of data from questionnaire .2; creating agenda for next litigation team meeting .1
4/27/2015	ME	0.3	redact privileged information from client documents to be precluded in response to answer to interrogatories
4/27/2015	ME	0.2	review questions data collected from clients regarding hours worked
4/27/2015	ME	0.2	rename client documents to include Bates number so documents can be produced to defense counsel
4/27/2015	ME	0.1	verify for client that her questions regarding her answer to interrogatories was received and is complete
4/27/2015	CLER	0.5	Bates stamp client documents responsive to interrogatories
4/27/2015	ME	0.4	draft agenda for next litigation team meeting
4/27/2015	ME	0.1	draft amended answer to rog for client
4/27/2015	ME	0.2	determine if we are able to combine data from multiple questions using questionnaire
4/27/2015	CLER	0.3	Bates stamp client documents to be produced in response to interrogatories
4/27/2015	JP	0.9	JLP/ME meeting to discuss organization and tracking of discovery documents .6; use of data from questionnaire .2; creating agenda for next litigation team meeting .1
4/28/2015	MR	0.2	address issues with using DTSearch indexes
4/28/2015	ME	0.1	save client documents sent in response to interrogatories
4/28/2015	ME	0.3	MR/JLP/ME mtg to discuss organization of plt and def discover document index
4/28/2015	ME	0.3	save client document to use as support for nonexempt Argument .1; create notes about document .2
4/28/2015	ME	0.2	review client documents responsive to interrogatories to determine which are ready to be produced to defense counsel
4/28/2015	JP	0.1	JP/MR discuss timeline issues for motion to compel .1
4/28/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
4/28/2015	MR	0.1	JP/MR discuss timeline issues for motion to compel .1
4/28/2015	DG	0.4	legal research on OSE .4
4/28/2015	ME	0.1	MR/ME discuss location of updated plt and def document index
4/28/2015	ME	0.3	compile original client documents to be sent back to client
4/28/2015	ME	0.1	relocate client documents on server for better use
4/28/2015	MR	0.1	MR/ME discuss location of updated plt and def document index
4/28/2015	MD	0.1	md call with defense counsel about stipulation to extend discovery 0.1
4/28/2015	MR	0.2	move original sets of production (prior to pdf breakout) from server to fileserver .1, email to paras about moving of files .1
4/28/2015	ME	0.2	review Bussell deposition to prepare outline for deposition digest
4/28/2015	ME	0.3	redact privileged information from client documents to be produced to defense
4/28/2015	ME	0.3	review status of client document production
4/28/2015	ME	0.2	determine outline to use for Bussell deposition digest

Date	Staff	Amount of Time	Description
4/28/2015	CLER	0.6	Bates stamp client documents responsive to interrogatories
4/28/2015	ME	0.4	review newly received client documents
4/28/2015	AG	0.1	prepare ltr to client (returning the originals as requested)
4/28/2015	JP	0.3	MR/JLP/ME mtg to discuss organization of plt and def discover document index
4/28/2015	CLER	0.4	Bates stamp client documents responsive to interrogatories
4/28/2015	MR	0.3	MR/JLP/ME mtg to discuss organization of plt and def discover document index
4/28/2015	ME	0.1	discuss issues with indexing of PLT and def discovery documents
4/28/2015	AG	0.1	prepare ltr to client (returning the originals as requested)
4/28/2015	ME	1	revise draft agenda for team meeting to include details to be discussed regarding discovery document management
4/29/2015	ME	0.1	JLP/ME discuss whether or not to produce responsive documents before a plaintiff's answer to interrogatories has been produced
4/29/2015	ME	0.1	send plt documents to zip file in order to produce to defense counsel
4/29/2015	DG	0.7	draft outline of strategy decision re our definition of primary job duty .7
4/29/2015	ME	0.1	email plaintiff regarding their amended answer to interrogatories
4/29/2015	CLER	0.5	file documents produced to defense counsel in proper location on server
4/29/2015	DG	1.2	JLP/MD/MR/DG/ME team meeting to discuss naming of documents to be produced to defense .1; status of PLT answers to interrogatories .1; website update .1; possible summary statement of RSR/TM primary job duty .9
4/29/2015	JP	0.1	JLP/ME discuss whether or not to produce responsive documents before a plaintiff's answer to interrogatories has been produced
4/29/2015	ME	0.1	send plt amended answers to interrogatories to zip file in order to produce to defense counsel
4/29/2015	ME	0.1	print team meeting agenda
4/29/2015	ME	0.1	JLP/ME discuss information about the status of interrogatories for team meeting agenda
4/29/2015	CLER	0.2	prepare mailing to client (returning the originals as requested)
4/29/2015	ME	0.1	email to plaintiff about their amended answer to interrogatories
4/29/2015	ME	0.1	document documents produced to defense counsel today in tracking spreadsheet
4/29/2015	ME	0.2	prepare amended answers to interrogatories for production to defense counsel by verifying that initial answers had been previously produced
4/29/2015	ME	1.2	JLP/MD/MR/DG/ME team meeting to discuss naming of documents to be produced to defense .1; status of PLT answers to interrogatories .1; website update .1; possible summary statement of RSR/TM primary job duty .9
4/29/2015	ME	0.1	file amended answers to interrogatories produced to defense counsel today in proper location on server
4/29/2015	JP	0.3	JLP/ME discuss locating documents that have been produced in response to interrogatories
4/29/2015	ME	0.5	review status of documents that have been received in response to interrogatories
4/29/2015	ME	0.1	document amended answers to interrogatories produced to defense counsel today in tracking spreadsheet
4/29/2015	MR	0.1	email to paras about revised Master document index
4/29/2015	MR	1.3	convert plaintiff and defendant document index to new format
4/29/2015	ME	0.3	verify that plt documents have been Bates stamped, redacted, and properly named before producing to defense counsel
4/29/2015	MR	1.3	prepare batch email 22 answers to rogs 1.1, email to para ME about mailing .2
4/29/2015	CLER	0.2	prepare mailing to client (returning the originals as requested)

Date	Staff	Amount of Time	Description
4/29/2015	JP	0.1	JLP/ME discuss information about the status of interrogatories for team meeting agenda
4/29/2015	ME	0.1	create list of documents to produce to defense counsel
4/29/2015	ME	0.1	produce amended answers to interrogatories and plt documents to defense counsel
4/29/2015	ME	0.4	review status of amended answers to interrogatories
4/29/2015	ME	0.1	email MR about questions answers for interrogatories that need to be sent to clients for review
4/29/2015	MR	1.2	JLP/MD/MR/DG/ME team meeting to discuss naming of documents to be produced to defense .1; status of PLT answers to interrogatories .1; website update .1; possible summary statement of RSR/TM primary job duty .9
4/29/2015	MD	1.2	JLP/MD/MR/DG/ME team meeting to discuss naming of documents to be produced to defense .1; status of PLT answers to interrogatories .1; website update .1; possible summary statement of RSR/TM primary job duty .9
4/29/2015	JP	1.2	JLP/MD/MR/DG/ME team meeting to discuss naming of documents to be produced to defense .1; status of PLT answers to interrogatories .1; website update .1; possible summary statement of RSR/TM primary job duty .9
4/29/2015	ME	1.2	JLP/MD/MR/DG/ME team meeting to discuss naming of documents to be produced to defense .1; status of PLT answers to interrogatories .1; website update .1; possible summary statement of RSR/TM primary job duty .9
4/30/2015	CLER	0.1	file client documents sent in response to answer to interrogatories
4/30/2015	ME	1	research public information about direct store delivery to be included in request to admit
4/30/2015	MR	0.2	MR/ME exchange information about direct store delivery
4/30/2015	ME	0.2	MR/ME exchange information about direct store delivery
4/30/2015	ME	0.2	research journal articles that describe/define direct store delivery to compile data for list of definitions for request to admit
4/30/2015	ME	2	research general public information on the internet about direct store delivery to determine best compilation of possible definitions for request to admit
4/30/2015	ME	0.1	determine details of information about direct store delivery to be researched and compiled for request to admit
4/30/2015	DG	0.1	DG/ME assign and explain role in researching/compiling definitions of Direct Store Delivery to be used for Request to Admit
4/30/2015	ME	0.1	JLP/ME decide best organization for client documents sent in response to interrogatories
4/30/2015	ME	0.4	analyze direct store delivery information to better understand information needed to support case
4/30/2015	ME	0.4	analyze case information to determine possible definition for plaintiff primary duty
4/30/2015	ME	0.2	refine list of possible direct store delivery definitions created for request for ease of reading
4/30/2015	ME	0.1	review article about Direct Store Delivery for definition to add to list of possible definitions for request to admit
4/30/2015	DG	0.5	draft primary duty statement for TMs in Snacks .3; review primary duty statement for RSRs in Morning Foods .1; emails to team re same .1
4/30/2015	JP	0.1	JLP/ME decide best organization for client documents sent in response to interrogatories
4/30/2015	ME	0.3	refine draft of plaintiff's primary duty summary
4/30/2015	ME	0.5	review industry document regarding Direct Store Delivery model for definition to include in list of definitions for request to admit

Date	Staff	Amount of Time	Description
4/30/2015	ME	0.1	DG/ME determine details of information about direct store delivery to be researched and compiled for request to admit
4/30/2015	DG	0.1	DG/ME determine details of information about direct store delivery to be researched and compiled for request to admit
4/30/2015	MD	0.1	MD/ME finalize draft of plaintiff job duty summary
4/30/2015	ME	0.4	include information about sources on list of possible direct store delivery definitions to use for request to admit
4/30/2015	ME	0.1	DG/ME assign and explain role in researching/compiling definitions of Direct Store Delivery to be used for Request to Admit
4/30/2015	MD	0.2	md/dg strategize about discovery needed concerning Kellogg's DSD model 0.2
4/30/2015	ME	0.1	email to attorney regarding location of list of direct store delivery definitions
4/30/2015	JP	0.2	dg/jp discuss requesting reference librarian to obtain articles in business journals re DSD definition and importance .2
4/30/2015	ME	0.3	add direct store delivery definitions previously compiled by MR to list of definitions for request to admit
4/30/2015	DG	0.4	md/dg strategize about response to defense counsel re discovery extension and filing motion to compel documents 0.4
4/30/2015	DG	0.3	dg/jp discuss requesting reference librarian to obtain articles in business journals re DSD definition and importance .2; review brief in support of discovery extension .1
4/30/2015	ME	0.1	JLP/ME verify receipt of client fax regarding documents for answer to interrogatories
4/30/2015	MD	0.4	md/dg strategize about response to defense counsel re discovery extension and filing motion to compel documents 0.4
4/30/2015	MD	0.4	md/dg conference call with defense re bifurcating the case and outstanding discovery issues 0.4
4/30/2015	DG	0.2	md/dg strategize about discovery needed concerning Kellogg's DSD model 0.2
4/30/2015	MD	0.5	md review and edit order concerning discovery 0.5
4/30/2015	ME	0.1	MD/ME finalize draft of plaintiff job duty summary
4/30/2015	DG	0.4	md/dg conference call with defense re bifurcating the case and outstanding discovery issues 0.4
5/1/2015	ME	0.1	send email to client regarding tracking information for client's documents
5/1/2015	ME	0.3	redact client documents responsive to interrogatories
5/1/2015	ME	0.2	review redact instructions for documents that need to be redacted before produced to defense counsel
5/1/2015	ME	1.2	research public sources for information on the importance and benefits of the Direct Store Delivery model to include in Request to Admit
5/1/2015	DG	0.3	review DSD literature for corroborating our primary duty analysis .3
5/1/2015	CLER	0.4	Bates stamp client documents responsive to interrogatories
5/1/2015	ME	0.1	send email to MR determine who will populate the tracking spreadsheet for new answers to interrogatories that have been produced
5/1/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
5/1/2015	ME	0.1	read email from client responding to request to review questions for answer to interrogatories to confirm its accuracy
5/1/2015	ME	0.1	redact privileged information from client documents responsive to interrogatories
5/1/2015	ME	0.2	organize emails from team regarding important discovery information
5/1/2015	ME	0.2	review production status of client documents responsive to interrogatories in order to sort out issues and make ready to produce



Date	Staff	Amount of Time	Description
5/1/2015	ME	0.1	send email to client regarding tracking number for document that were sent back
5/1/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
5/1/2015	ME	0.1	email list of Direct Store Delivery definitions to team
5/1/2015	JP	0.1	JLP/ME determine production status of client documents responsive to interrogatories
5/1/2015	ME	0.1	JLP/ME determine status of client documents responsive to interrogatories
5/1/2015	CLER	0.1	Bates stamp client documents
5/1/2015	ME	0.1	JLP/ME determine production status of client documents responsive to interrogatories
5/1/2015	ME	0.2	review production status of client documents responsive to interrogatories in order to sort out redacting issue and make ready to produce
5/1/2015	ME	0.1	read email from client responding to request to review questions for answer to interrogatories to confirm its accuracy
5/1/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
5/1/2015	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy(FINAL ASCII from the 4-21-2015 deposition of Mr. Salmon, readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
5/1/2015	ME	0.1	review client documents responsive to interrogatories
5/1/2015	JP	0.1	JLP/ME determine status of client documents responsive to interrogatories
5/1/2015	CLER	0.4	Bates stamp client documents responsive to interrogatories
5/1/2015	ME	0.2	redact privileged information from client documents responsive to interrogatories
5/1/2015	ME	0.2	review client documents responsive to interrogatories to determine status for production
5/4/2015	ME	0.1	draft amended answer to interrogatories
5/4/2015	ME	0.5	analyze Direct Store Delivery research paper to gather facts to support nonexempt Argument
5/4/2015	ME	0.1	track receipt of client documents responsive to interrogatories
5/4/2015	CLER	0.1	file hard copy of of Salmon deposition
5/4/2015	ME	0.3	redact privileged information form documents responsive to interrogatories
5/4/2015	ME	0.1	file email regarding amended answers to interrogatories
5/4/2015	MD	0.5	md drafting email to defense counsel about defense counsel's agreement to produce documents 0.5
5/4/2015	ME	0.1	file scanned client documents responsive to interrogatories
5/4/2015	ME	0.2	read emails from team about direct store delivery research to be used to support case
5/4/2015	ME	0.1	review plt mid year review to gather information to support nonexempt Argument
5/4/2015	CLER	0.2	create PDF format of documents recd from client (paystubs, handbook, etc.)
5/4/2015	CLER	0.7	Bates stamp client documents responsive to interrogatories
5/4/2015	ME	0.3	file emails to clients regarding review of their answers to interrogatories
5/4/2015	ME	0.1	telephone call with client regarding case update
5/4/2015	ME	0.1	track receipt of amended answer to interrogatories on master tracking spreadsheet
5/5/2015	ME	0.1	look up client termination date to determine exclusion information
5/5/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
5/5/2015	ME	0.2	telephone call with client regarding exclusion from case .1; notes from conversation .1

Date	Staff	Amount of Time	Description
5/5/2015	CLER	0.4	Bates stamp client documents responsive to interrogatories
5/5/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
5/5/2015	ME	0.1	organize email
5/5/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
5/5/2015	ME	0.1	redact privileged information from client documents responsive to interrogatories
5/5/2015	CLER	0.1	Bates stamp client documents responsive to interrogatories
5/5/2015	CLER	0.2	Bates stamp client documents responsive to interrogatories
5/5/2015	ME	0.1	telephone call from client regarding question about severance packet
5/5/2015	ME	0.2	organize client documents sent in response to interrogatories
5/6/2015	ME	0.1	track receipt of client documents responsive to interrogatories
5/6/2015	ME	0.1	download discovery documents produced by defense counsel
5/6/2015	JS	0.1	spouse of plt called for info
5/6/2015	ME	0.4	jlp/me discuss issue regarding excluded plaintiff
5/6/2015	ME	0.1	file newly received client documents responsive to interrogatories
5/6/2015	JP	0.4	jlp/me discuss issue regarding excluded plaintiff
5/6/2015	ME	0.9	review Bussell deposition to further develop outline .4; find relevant transcript excerpts .5
5/6/2015	ME	1.5	review Bussell deposition to compile excerpts for deposition digest
5/6/2015	CLER	0.2	create PDF format of documents recd from client
5/6/2015	CLER	0.5	create PDF format of documents recd from client
5/6/2015	ME	0.2	create initial draft outline for Bussell deposition
5/7/2015	ME	0.1	mr/me discuss updated tracking sheet for answers to interrogatories
5/7/2015	MD	0.2	md/dg discussing edits to joint stipulation for extension of discovery deadlines 0.2
5/7/2015	ME	0.3	JLP/ME meeting to refine process of producing discovery documents to opposing counsel .1; develop list of priorities .1; and discuss case information .1
5/7/2015	ME	0.1	mr/me discuss updated tracking sheet for answers to interrogatories
5/7/2015	ME	0.5	prepare group of answers to interrogatories for production to defense counsel today
5/7/2015	JS	0.1	js/jp engage in discourse about managing plaintiff expectations in light of typical case timelines for complex litigation
5/7/2015	ME	0.1	ME/MR check in on our need to update Interrogatory Answers master list
5/7/2015	DG	0.2	md/dg discussing edits to joint stipulation for extension of discovery deadlines 0.2
5/7/2015	MR	0.1	discuss populating tracking spreadsheet with information about documents needed indicated on newly received questions for answers to interrogatories
5/7/2015	JP	0.3	JLP/ME meeting to refine process of producing discovery documents to opposing counsel .1; develop list of priorities .1; and discuss case information .1
5/7/2015	JP	0.1	js/jp engage in discourse about managing plaintiff expectations in light of typical case timelines for complex litigation
5/7/2015	MR	0.1	mr/me discuss updated tracking sheet for answers to interrogatories
5/7/2015	ME	0.2	prepare plaintiff documents responsive to interrogatories for production by applying Bates stamp .1; and redacting privileged information .1
5/7/2015	ME	1	prepare group of plaintiff documents for production to defense counsel today
5/7/2015	MD	0.2	md review discovery responses from defense counsel regarding discovery 0.2
5/7/2015	MR	0	update Kellogg data
5/7/2015	ME	0.1	file newly received plaintiff documents responsive to interrogatories on server

Date	Staff	Amount of Time	Description
5/7/2015	ME	0.1	discuss populating tracking spreadsheet with information about documents needed indicated on newly received questions for answers to interrogatories
5/7/2015	MR	0.1	ME/MR check in on our need to update Interrogatory Answers master list
5/7/2015	ME	0.1	track produced answers to interrogatories in master spreadsheet
5/7/2015	ME	0.1	produce group of 21 answers to interrogatories to defense counsel
5/7/2015	ME	0.1	file discovery documents produced by opposing counsel
5/8/2015	ME	0.1	file/organize emails from litigation team
5/8/2015	ME	0.1	email answer to interrogatories to plaintiff for review
5/8/2015	ME	0.9	continue to divide large document with exclusion letters into individual documents
5/8/2015	ME	0.8	file newly produced plaintiff documents on server
5/8/2015	ME	0.2	email answer to interrogatories to plaintiff for review
5/8/2015	CLER	0.1	Create PDF format of documents recd from client
5/8/2015	MR	0.1	ME/MR discuss options for splitting large word document into multiple documents
5/8/2015	ME	0.6	break large word document of exclusion letters into individual documents for filing purposes
5/8/2015	ME	0.2	download newly received questionnaire responses for answer to interrogatories .1; file on server .1
5/8/2015	ME	0.1	ME/MR discuss options for splitting large word document into multiple documents
5/8/2015	DG	1.1	call to reference librarian for academic papers on DSD .3; email to librarian to give details of info needed .3; draft our formulation of primary duty .5
5/8/2015	ME	0.1	attempt to email answer to interrogatories to plaintiff for review
5/8/2015	ME	0.1	save sent emails regarding reviewing answers to interrogatories in Time Matters
5/8/2015	MD	0.1	md review dg draft of plaintiffs' primary job duty 0.1
5/8/2015	ME	0.1	email answer to interrogatories to plaintiff for review
5/8/2015	ME	0.7	determine which plaintiff documents need to attorney review
5/8/2015	ME	0.1	email answer to interrogatories to plaintiff for review
5/8/2015	ME	0.3	produce plaintiff discovery documents to defense counsel
5/8/2015	ME	0.1	telephone call with client to ask for updated email address
5/8/2015	MA	0.1	MA/ME demonstrate how to use AIM to contact clients
5/8/2015	ME	0.1	email answer to interrogatories to plaintiff for review
5/8/2015	ME	0.1	email answer to interrogatories to plaintiff for review
5/8/2015	ME	0.1	MA/ME demonstrate how to use AIM to contact clients
5/8/2015	ME	0.1	email notification of newly downloaded questions responses to team member
5/8/2015	DG	0.1	DG/ME decide if a search for journal articles about Direct Store Delivery would be useful information .1
5/8/2015	ME	0.1	send email address in a text message to plaintiff as requested
5/8/2015	MR	0.1	MR/ME discuss best way to divide a large word document into multiple documents
5/8/2015	ME	0.1	MR/ME discuss best way to divide a large word document into multiple documents
5/8/2015	ME	0.1	left voice message for plaintiff regarding updating contact information
5/8/2015	ME	0.1	JLP/ME determine process for adding information to answer to interrogatory as requested by plaintiff and before it has been produced to defense counsel
5/8/2015	JP	0.1	JLP/ME determine process for adding information to answer to interrogatory as requested by plaintiff and before it has been produced to defense counsel

Date	Staff	Amount of Time	Description
5/8/2015	ME	0.1	DG/ME decide if a search for journal articles about Direct Store Delivery would be useful information
5/8/2015	ME	0.1	update tracking spreadsheet to document newly produced plaintiff documents
5/11/2015	ME	0.1	draft email to plaintiff to determine which answers to use from duplicate questions regarding answer to interrogatories
5/11/2015	DG	0.2	edit draft extension request .2
5/11/2015	ME	0.2	break PLT documents into categories for ease of filing/referencing
5/11/2015	ME	0.2	draft email to plaintiff to determine which answers to use from duplicate questions regarding answer to interrogatories
5/11/2015	ME	1.1	analyze tracking spreadsheet to determine current status of answers to interrogatories and responsive documents
5/11/2015	ME	0.1	save newly received client documents responsive to interrogatories
5/11/2015	ME	0.7	break PLT documents into categories for ease of filing/referencing
5/11/2015	ME	0.2	draft email to client re sending documents responsive to interrogatories
5/11/2015	ME	0.1	track newly received client docs
5/11/2015	ME	0.1	determine who has taken the questions for answer to interrogatories more than once
5/11/2015	ME	0.3	draft email to plaintiff to determine which answers to use from duplicate questions regarding answer to interrogatories
5/11/2015	ME	0.1	review newly received client documents
5/11/2015	ME	0.1	review newly received client documents
5/11/2015	ME	0.1	create FedEx label for client to use to send documents to our office
5/11/2015	ME	0.4	draft email to client regarding clarifying answers from duplicate questions for answer to interrogatories
5/11/2015	ME	0.2	telephone call with plaintiff regarding sending documents to our office
5/11/2015	ME	0.1	email FedEx label to client to use to send documents to our office
5/11/2015	ME	0.4	finish breaking out letters to excluded plaintiffs into single documents
5/12/2015	CLER	0.2	Bates stamp client documents
5/12/2015	ME	0.2	review client documents to determine which are ready to be produced to defense counsel
5/12/2015	CLER	0.1	Bates stamp client documents
5/12/2015	MD	0.7	md drafting motion to compel documents 0.7
5/12/2015	MD	0.3	md review and edit stipulation re extension of time 0.3
5/12/2015	ME	0.2	verify that client documents have been saved in client folder
5/12/2015	ME	0.1	redact privileged information from client documents
5/12/2015	ME	0.7	review client documents in order to redact privileged information
5/12/2015	ME	0.1	save client documents in client folder on server
5/13/2015	ME	0.6	jlp/me/md team meeting to determine best practice for contacting plaintiffs who need to provide us with their documents responsive to interrogatories .5; review case schedule .1
5/13/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#307 - NOTICE of Withdrawal of Consent to Sue ; filed by Plaintiff Patty Thomas. (Dunn, Matt)
5/13/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy(Docket#308 - Stipulated MOTION To Extend Discovery Deadline and Other Case Deadlines by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1) Proposed Order) Noting Date 5/12/2015, (Boudreau, James)
5/13/2015	ME	0.6	create list of plaintiffs who have documents but have not provided them yet so that paralegals on the case can call and request they send their documents to our office

Date	Staff	Amount of Time	Description
5/13/2015	ME	0.4	enter documents provided, but not yet produced, by plaintiffs in response to interrogatories into master tracking spreadsheet
5/13/2015	JP	1.5	JLP/ME meeting to determine process for contacting plaintiffs who need to send documents responsive to interrogatories
5/13/2015	MD	0.6	jlp/me/md team meeting to determine best practice for contacting plaintiffs who need to provide us with their documents responsive to interrogatories .5; review case schedule .1
5/13/2015	JP	0.6	jlp/me/md team meeting to determine best practice for contacting plaintiffs who need to provide us with their documents responsive to interrogatories .5; review case schedule .1
5/13/2015	ME	1.5	JLP/ME meeting to determine process for contacting plaintiffs who need to send documents responsive to interrogatories
5/13/2015	MD	0.5	md draft motion to compel 0.5
5/14/2015	ME	0.1	email to plaintiff in response to inquiry about case update
5/14/2015	ME	0.1	download defendant discovery production
5/14/2015	MD	0.1	md respond to court clerk re length of trial 0.1
5/14/2015	ME	0.6	review plaintiff documents to determine which should be produced to defense council and which cannot be produced because of attorney-client privilege
5/14/2015	ME	0.1	save discovery documents produced by defense counsel
5/14/2015	MD	0.5	drafting motion to compel 0.5
5/14/2015	ME	0.1	save discovery documents produced by defendants
5/14/2015	ME	0.1	redact privileged information from plaintiff documents
5/14/2015	ME	0.1	update interrogatories tracking spreadsheet to include the tracking of data regarding plaintiffs' privileged documents
5/14/2015	CLER	0.2	file hard copies of client documents
5/14/2015	ME	0.2	redact privileged information from client documents
5/14/2015	MD	0.5	md review dates per court's order 0.5
5/14/2015	CLER	0.8	Bates stamp client documents responsive to interrogatories
5/14/2015	ME	0.1	organize emails
5/14/2015	ME	1	rename discovery documents produced by defense for consistency with our filing system
5/14/2015	ME	0.1	redact privileged information from plaintiffs documents responsive to interrogatories
5/14/2015	MD	0.5	md review Kellogg's discovery production 0.5
5/14/2015			Transfer documents recd from ECF system to docket file and create file copy(Docket#310 - REVISED MINUTE ORDER SETTING TRIAL AND PRETRIAL DATES ; Length of Trial: *Counsel to advise regarding the length of trial*. Jury Trial is reset for 4/11/2016 at 09:00 AM in B Courtroom before Judge Ronald B. Leighton. Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by 10/14/2015, Motions due by 11/23/2015, Discovery completed by 10/9/2015, Dispositive motions due by 1/12/2016, Attorney settlement conference to be held by 2/3/2016, 39.1 mediation to be completed by 3/8/2016, 39.1 Settlement Report due by 3/15/2016, Motions in Limine due by 3/7/2016, Pretrial Order due by 3/25/2016, Pretrial Conference set for 3/31/2016 at 08:30 AM in B Courtroom before Judge Ronald B. Leighton. Trial briefs to be submitted by 3/25/2016, Proposed voir dire/jury instructions due by 3/28/2016. s/Jean Boring as authorized by Judge Ronald B. Leighton. (JAB)
	CLER	0.1	
5/14/2015	ME	0.1	left voicemail for plaintiff regarding needing an updated email address

Date	Staff	Amount of Time	Description
5/14/2015			Transfer documents recd from ECF system to docket file and create file copy(Docket#309 - ORDER granting [308] Stipulation to extend discovery by Judge Ronald B. Leighton.
	CLER	0.1	Discovery completed by 10/9/2015. Clerk to issue new scheduling order. (JAB)
5/15/2015	ME	0.1	sent email to plaintiff regarding reviewing duplicate questions responses
5/15/2015	ME	0.2	organize plaintiff documents responsive to interrogatories on the server
5/15/2015	ME	0.1	review discovery documents recently produced by defense counsel
5/15/2015	ME	0.2	send email to plaintiff regarding reviewing duplicate questions responses
5/15/2015	ME	0.1	listen to voicemail from plaintiff
5/15/2015	ME	0.1	email to plaintiff regarding request to review duplicate questions responses
5/15/2015	ME	0.2	email to plaintiff in response to question about case update
5/15/2015	ME	0.1	review status of plaintiff amended answers to interrogatories
5/15/2015	ME	0.1	organize plaintiff documents saved on server
5/15/2015	ME	0.2	revise plaintiff's answer to interrogatories based upon their request to do so after review
5/15/2015	ME	0.2	send email to plaintiff regarding reviewing duplicate answers to questions
5/15/2015	ME	0.2	telephone call with plaintiff regarding reviewing duplicate responses to questions
5/15/2015	ME	0.4	redact privileged information from plaintiff documents responsive to interrogatories
5/15/2015	ME	0.2	update column headings in tracking spreadsheet for calls to plaintiffs who need to send us their documents
5/15/2015	ME	0.2	review plaintiff documents responsive to interrogatories to determine which have handwritten notes for attorneys in order to call plaintiff and ask what information needs to be redacted due to attorney-client privilege
5/18/2015	MD	0.3	md/me determine which of requested documents for discovery are still outstanding
5/18/2015	ME	1.3	review documents produced by defense counsel to determine responsiveness to discovery demands
5/18/2015	ME	0.3	review discovery documents produced by defense counsel
5/18/2015	ME	0.2	send Answer to Interrogatories to plaintiff for their review before sending to defense counsel
5/18/2015	ME	0.1	download discovery documents produced by defense counsel
5/18/2015	ME	0.3	add plaintiff documents with privilege information to privilege log folder on server
5/18/2015	ME	0.2	Bates stamp opt-in plaintiff documents responsive to interrogatories
5/18/2015	ME	0.4	pull out opt-in plaintiff documents that cannot be produced because of privileged information .1; file privileged documents on server .1; give new Bates numbers to documents .1; redact privileged information .1
5/18/2015	ME	0.3	remove incorrect Bates number .1; and restamp with correct Bates number .2 so that the documents can be reproduced to defense counsel with correct Bates numbering
5/18/2015	ME	0.3	md/me determine which of requested documents for discovery are still outstanding
5/18/2015	ME	0.5	MA/ME meet to review process for indexing discovery documents
5/18/2015	MA	0.5	MA/ME meet to review process for indexing discovery documents
5/19/2015	ME	1	prepare opt-in plaintiff documents for production to defense counsel
5/19/2015	ME	0.1	listen to voicemail from opt-in plaintiff regarding case update
5/19/2015	ME	0.1	check website to determine when the last case update was posted
5/19/2015	ME	0.1	listen to voicemail from opt-in plaintiff regarding documents sent to our office



Date	Staff	Amount of Time	Description
5/19/2015	MD	0.3	md/me decide on method for indexing discovery documents
5/19/2015	ME	0.2	Bates stamp opt-in plaintiff documents responsive to interrogatories
5/19/2015	ME	0.3	md/me decide on method for indexing discovery documents
5/19/2015	ME	0.9	prepare opt-in plaintiff documents for production by determining which documents need to be reviewed with plaintiff for possible privileged information
5/19/2015	ME	0.1	telephone call with opt-in plaintiff for case update
5/19/2015	ME	0.4	review opt-in plaintiff documents responsive to interrogatories
5/20/2015	ME	0.4	read Direct Store Delivery articles found by research librarian to find facts to support exemption Argument
5/20/2015	ME	0.3	review opt-in plaintiff documents to be sure all privileged information has been redacted before producing to defense counsel
5/20/2015	ME	0.5	run updated index for defendant's discovery production .2; and add to master index .3
5/20/2015	MD	0.6	jlp/md/mr(in part)/me litigation team meeting to determine task priorities for team members
5/20/2015	ME	0.2	me/mr decide on method for organizing index for defendant discovery production
5/20/2015	JP	0.6	jlp/md/mr(in part)/me litigation team meeting to determine task priorities for team members
5/20/2015	ME	0.1	review website case update draft for any necessary edits
5/20/2015	MR	0.5	jlp/md/mr(in part)/me litigation team meeting to determine task priorities for team members
5/20/2015	MR	0.2	me/mr decide on method for organizing index for defendant discovery production
5/20/2015	ME	0.4	organize emails from litigation team members .2; organize emails received by opt-in plaintiffs regarding interrogatories .2
5/20/2015	ME	0.3	review index for defendant's discovery production to determine how the index can be improved for efficiency
5/20/2015	ME	0.9	verify that all documents produced by the defense counsel have been downloaded and saved
5/20/2015	ME	0.6	jlp/md/mr(in part)/me litigation team meeting to determine task priorities for team members
5/20/2015	ME	0.2	prepare correct answer to interrogatory to be reviewed by opt-in plaintiff based upon opt-in plaintiff's response to which questions was most accurate (opt-in plaintiff had responded to the questions twice with slightly inconsistent answers)
5/21/2015	CLER	0.1	file hard copies of opt-in plaintiff documents
5/21/2015	JP	0.6	jlp/me meeting to review paralegal list of priorities .1; assign tasks .1; determine process for indexing defendant and plaintiff production .4
5/21/2015	ME	0.2	save opt-in plaintiff documents responsive to interrogatories
5/21/2015	ME	0.1	jlp/mr/me discuss agenda and time for meeting regarding indexing of defendant and plaintiff production .1
5/21/2015	CLER	0.1	create PDF format of documents recd from Client
5/21/2015	ME	0.1	begin draft agenda for next litigation team meeting
5/21/2015	ME	0.6	jlp/me meeting to review paralegal list of priorities .1; assign tasks .1; determine process for indexing defendant and plaintiff production .4
5/21/2015	ME	0.7	draft email to opt-in plaintiffs requesting documents they indicated they had in their answers to interrogatories

Date	Staff	Amount of Time	Description
5/21/2015	ME	0.2	run updated index for plaintiff document production .1; and for defendant document production .1
5/21/2015	MD	0.1	jlp/me/md discuss use of indexing for tracking documents to support case
5/21/2015	JP	0.1	jlp/me/md discuss use of indexing for tracking documents to support case
5/21/2015	JP	0.1	jlp/mr/me discuss agenda and time for meeting regarding indexing of defendant and plaintiff production .1
5/21/2015	MR	0.1	jlp/mr/me discuss agenda and time for meeting regarding indexing of defendant and plaintiff production .1
5/21/2015	MR	0.6	mr/jlp/me discuss plan for indexing defendant and plaintiff discovery documents
5/21/2015	ME	0.6	mr/jlp/me discuss plan for indexing defendant and plaintiff discovery documents
5/21/2015	ME	0.1	review newly received opt-in plaintiff documents
5/21/2015	ME	0.1	jlp/me/md discuss use of indexing for tracking documents to support case
5/21/2015	ME	0.3	create list of priorities for paralegals in order to assign tasks and ensure efficiency
5/21/2015	JP	0.6	mr/jlp/me discuss plan for indexing defendant and plaintiff discovery documents
5/21/2015	ME	0.3	email opt-in plaintiffs who have not yet sent us their documents responsive to interrogatories requesting that they send those documents to us as soon as possible
5/21/2015	ME	0.7	review opt-in plaintiff documents to ensure attorney-client privilege before producing documents to defense counsel
5/22/2015	MD	0.2	md email defense counsel regarding outstanding discovery 0.2
5/22/2015	CLER	0.2	prepare FedEx label for client (mailing of documents for discovery)
5/22/2015	MR	2.7	work on Kellogg Def Prod list index and sort order, remove # sign in numerous folder names, remove # sign in multiple file names, proof and revise Bates sort algorithm for Def Prod
5/26/2015	JP	0.5	jlp/me meeting to discuss status of the preparation and production of opt-in plaintiff documents that are responsive to interrogatories
5/26/2015	ME	0.1	draft amended answers to interrogatories for opt-in plaintiff per plaintiff's request
5/26/2015	MD	0.5	md research ME state law for class actions 0.5
5/26/2015	ME	0.5	jlp/me meeting to discuss status of the preparation and production of opt-in plaintiff documents that are responsive to interrogatories
5/26/2015	ME	0.2	email reply to opt-in plaintiff regarding question about sending documents responsive to interrogatories
5/26/2015	ME	0.1	email opt-in plaintiff in response to question about sending documents responsive to interrogatories to our office
5/26/2015	ME	0.6	save opt-in plaintiff emails responding to request to send documents responsive to interrogatories to our office
5/26/2015	ME	0.1	update opt-in plaintiff's contact information
5/26/2015	ME	0.1	draft amended answers to interrogatories for opt-in plaintiff per plaintiff's request
5/26/2015	MD	0.2	md/dg discussing amount of time we need to try the case 0.2
5/26/2015	ME	0.3	draft amended answers to interrogatories for opt-in plaintiff per request
5/26/2015	ME	0.1	draft amended answers to interrogatories for opt-in plaintiff per plaintiff's request
5/26/2015	DG	0.3	md/dg discussing other RSR cases filed in Kellogg and action to take to ensure this case is protected from potentially bad summary judgment decisions 0.3

Date	Staff	Amount of Time	Description
5/26/2015	DG	0.2	md/dg discussing amount of time we need to try the case 0.2
5/26/2015	ME	0.3	email to opt-in plaintiff responding to opt-in plaintiff's question regarding sending us documents responsive to interrogatories
5/26/2015	MD	0.2	md call with defense counsel about discovery issues 0.2
5/26/2015	ME	0.1	email FedEx label to opt-in plaintiff
5/26/2015	ME	0.1	draft amended answers to interrogatories for opt-in plaintiff per plaintiff's request
5/26/2015	ME	0.1	review complaint filed for Retail Sales Representative for another case against Kellogg in the state of Maine
5/26/2015	ME	0.3	save opt-in plaintiff documents that are responsive to interrogatories on server
5/26/2015	ME	0.2	create FedEx label for opt-in plaintiff to use to send documents responsive to interrogatories to our office
5/26/2015	ME	0.1	draft amended answers to interrogatories for opt-in plaintiff per plaintiff's request
5/26/2015	ME	0.3	update tracking spreadsheet to include status of responses from opt-in plaintiffs regarding sending documents responsive to interrogatories
5/26/2015	ME	0.1	save received opt-in plaintiff's documents that are responsive to interrogatories
5/26/2015	MD	0.3	md/dg discussing other RSR cases filed in Kellogg and action to take to ensure this case is protected from potentially bad summary judgment decisions 0.3
5/26/2015	ME	0.2	verify receipt of opt-in plaintiff's documents responsive to interrogatories
5/26/2015	MD	0.5	md research pending Kellogg cases, review complaint, and contact plaintiff's counsel 0.5
5/26/2015	ME	0.1	download discovery documents produced by defense counsel
5/26/2015	ME	0.1	draft amended answer to interrogatories for opt-in plaintiff per plaintiff's request
5/26/2015	ME	0.1	telephone call with opt-in plaintiff for case update
5/26/2015	ME	0.1	draft amended answers to interrogatories for opt-in plaintiff per plaintiff's request
5/27/2015	ME	0.1	organize emails received from opt-in plaintiffs regarding request to send their documents to our office
5/27/2015	ME	0.2	produce opt-in plaintiff documents responsive to interrogatories to opposing counsel
5/27/2015	MD	1.1	md/dg call with counsel in McCart case pending in Kentucky and discuss outside sales arguments 1.1
5/27/2015	ME	0.6	prepare opt-in plaintiffs' documents for production
5/27/2015	ME	0.3	prepare opt-in plaintiff documents for production to defense counsel
5/27/2015	DG	1.1	md/dg call with counsel in McCart case pending in Kentucky and discuss outside sales arguments 1.1
5/27/2015	ME	0.1	print documents for litigation team meeting
5/27/2015	MD	1.1	dg/md/jlp/me litigation team meeting to review discovery production status 4; create process for moving forward to get outstanding documents 2; plan to further develop outside sales exemption Argument 2; discuss contacting attorneys from other firms handling newly filed cases against Kellogg .3
5/27/2015	JP	1.1	dg/md/jlp/me litigation team meeting to review discovery production status 4; create process for moving forward to get outstanding documents 2; plan to further develop outside sales exemption Argument 2; discuss contacting attorneys from other firms handling newly filed cases against Kellogg .3

Date	Staff	Amount of Time	Description
5/27/2015	DG	1.1	dg/md/jlp/me litigation team meeting to review discovery production status 4; create process for moving forward to get outstanding documents 2; plan to further develop outside sales exemption Argument 2; discuss contacting attorneys from other firms handling newly filed cases against Kellogg .3
5/27/2015	ME	0.1	dg/me assign tasks related to compiling information about Direct Store Delivery to be used in Request to Admit
5/27/2015	DG	0.3	dg/ms discuss proof issues re DSD model and OSE .3
5/27/2015	ME	0.1	draft amended answer to interrogatories for opt-in plaintiff upon plaintiff's request
5/27/2015	MS	0.3	dg/ms discuss proof issues re DSD model and OSE .3
5/27/2015	ME	0.1	email to opt-in plaintiff responding to request to verify that we received her resume, which is a document responsive to interrogatories
5/27/2015	DG	0.1	dg/me assign tasks related to compiling information about Direct Store Delivery to be used in Request to Admit
5/27/2015	ME	1.1	dg/md/jlp/me litigation team meeting to review discovery production status 4; create process for moving forward to get outstanding documents 2; plan to further develop outside sales exemption Argument 2; discuss contacting attorneys from other firms handling newly filed cases against Kellogg .3
5/27/2015	ME	0.1	save recently received opt-in plaintiff's documents responsive to interrogatories
5/27/2015	ME	0.4	organize plaintiffs' documents that were produced to opposing counsel today
5/27/2015	ME	0.4	calculate current status of opt-in plaintiff's responses to interrogatories
5/28/2015	ME	0.1	Bates stamp opt-in plaintiff's documents that are responsive to interrogatories
5/28/2015	ME	0.1	save discovery documents produced by defendant's
5/28/2015	ME	0.3	Bates stamp opt-in plaintiff documents
5/28/2015	ME	0.4	rename folders of documents produced by defense counsel for filing consistency
5/28/2015	ME	0.2	Bates stamp opt-in plaintiff documents that are responsive to interrogatories
5/28/2015	ME	0.1	telephone call with opt-in for case update
5/28/2015	ME	0.6	Bates stamp opt-in plaintiff documents responsive to interrogatories
5/28/2015	ME	0.2	organize emails sent by litigation team
5/28/2015	ME	0.2	save discovery documents produced by defense counsel
5/28/2015	ME	0.4	Bates stamp opt-in plaintiff documents that are responsive to interrogatories
5/28/2015	ME	0.1	Bates stamp opt-in plaintiff documents that are responsive to interrogatories
6/1/2015	ME	0.1	drafted amended answer to interrogatories per opt-in plaintiff's request
6/1/2015	CLER	0.1	Data Entry of contact information
6/1/2015	CLER	0.1	create PDF format of CTS recd
6/1/2015	ME	0.2	verify receipt of opt-in plaintiff documents .1; respond to opt-in plaintiff's email to verify receipt of documents .1
6/1/2015	CLER	0.1	create PDF format of documents recd from Client
6/1/2015	ME	0.1	organize emails received by opt-in plaintiffs in response to our request to send their documents that are responsive to the interrogatories
6/1/2015	MD	0.1	me/md discuss filing of new consent to sue forms
6/1/2015	ME	0.1	Bates stamp opt-in plaintiff documents that are responsive to interrogatories
6/1/2015	ME	0.2	save most accurate questions for answers to interrogatories as designated by opt-in plaintiff who responded to more than one questions
6/1/2015	ME	0.1	draft amended answer to interrogatories for opt-in plaintiff per opt-in's request
6/1/2015	ME	0.1	review emails in inbox and mark those that need priority attention
6/1/2015	ME	0.1	me/md discuss filing of new consent to sue forms

Date	Staff	Amount of Time	Description
6/1/2015	ME	0.1	Bates stamp opt-in plaintiff documents that are responsive to interrogatories
6/2/2015	ME	0.6	compile direct store delivery information for litigation team to reference when brainstorming primary duty definition
6/2/2015	ME	0.2	Bates stamp opt-in plaintiff's documents responsive to interrogatories
6/2/2015	ME	0.1	MD/ME discuss submitting amended answers to interrogatories for plaintiff's who have done a diligent search for their documents and could not find them
6/2/2015	ME	0.3	Bates stamp opt-in plaintiff's documents that are responsive to interrogatories
6/2/2015	MD	0.5	md review Kellogg document production 0.5
6/2/2015	ME	1.1	update index for discovery documents produced by defense counsel
6/2/2015	ME	0.9	Bates stamp opt-in plaintiff's documents in preparation of production to defense counsel
6/2/2015	ME	0.3	determine status of plaintiff production to report at next litigation team meeting
6/2/2015	ME	0.8	Bates stamp opt-in plaintiff's documents to prepare for production to defense counsel
6/2/2015	DG	1.6	web research on Kellogg's statements re DSD 1; work on formulating primary duty for DSD .6
6/2/2015	ME	0.9	review Direct Store Delivery information in order to formulate a refined definition of clients' primary duty
6/2/2015	ME	0.3	review (in part) documents produced by defendants for gaps in Bates numbers to ensure there are no missing documents
6/2/2015	MD	0.1	MD/ME discuss submitting amended answers to interrogatories for plaintiff's who have done a diligent search for their documents and could not find them
6/2/2015	MR	0.9	review various articles about Direct Store Delivery and Just in Time models .6, web search for recent Kellogg DSD articles .3
6/2/2015	ME	0.6	review discovery documents produced by defense counsel in order to update index of those documents
6/2/2015	ME	0.5	review information about direct store delivery to help formulate primary duty definition
6/2/2015	MR	0.1	ME/MR discuss DSD definitions
6/2/2015	ME	0.1	ME/MR discuss DSD definitions
6/3/2015	ME	0.5	rename document folders produced by defense counsel for consistency with our filing system
6/3/2015	ME	0.4	update index for documents produced by defense counsel to indicate which are useful to support the case
6/3/2015	ME	0.7	Bates stamp opt-in plaintiff's documents to prepare for production to defense counsel
6/3/2015	ME	1	Bates stamp opt-in plaintiff's documents to prepare for production to defense counsel
6/3/2015	CM	0.1	provide rough translation of client document - email in Spanish - to JP (.1)
6/3/2015	ME	0.3	Bates stamp opt-in plaintiff documents to prepare for production to defense counsel
6/3/2015	ME	0.3	Bates stamp opt-in plaintiff documents to prepare for production to defense counsel
6/3/2015	ME	0.3	review status of production for plaintiff's answers to interrogatories
6/4/2015	JP	0.1	JLP/ME discuss draft email to opt-ins who need to review their amended answer to interrogatives before producing to defense counsel
6/4/2015	ME	0.1	Bates stamp opt-in plaintiff documents to prepare for production to defense counsel
6/4/2015	ME	0.1	review answer to interrogatory received by opt-in plaintiff via postal mail

Date	Staff	Amount of Time	Description
6/4/2015	ME	0.1	redact opt-in plaintiff documents to prepare for production to defense counsel
6/4/2015	ME	0.4	draft email to opt-in plaintiffs who need to review their amended answer to interrogatories before producing to defense counsel
6/4/2015	CLER	1	create PDF format of documents recd from client
6/4/2015	ME	0.1	JLP/ME discuss draft email to opt-ins who need to review their amended answer to interrogatives before producing to defense counsel
6/4/2015	ME	0.1	called opt-in plaintiff regarding received answer to interrogatories - left voicemail
6/4/2015	ME	0.1	reschedule team meeting for tomorrow
6/4/2015	ME	0.1	MD/ME review discovery documents to prepare email to defense counsel requesting what is still outstanding
6/4/2015	ME	0.2	redact privileged information from opt-in plaintiff's documents
6/4/2015	ME	0.1	calendar litigation team meeting for today
6/4/2015	ME	1	review status of amended answers to interrogatories to determine which are ready to be produced to defense counsel
6/4/2015	ME	0.2	telephone call with opt-in plaintiff with questions about sending documents to our office .1; notes from conversation .1
6/4/2015	ME	0.2	verify that amended answers to interrogatories are ready to be produced to defense counsel
6/4/2015	ME	0.2	Bates stamp opt-in plaintiff documents responsive to prepare for production to defense counsel
6/4/2015	MD	0.1	MD/ME review discovery documents to prepare email to defense counsel requesting what is still outstanding
6/4/2015	CLER	0.2	file hard copies of opt-in plaintiff documents
6/4/2015	ME	0.4	determine which opt-in plaintiff answers to interrogatories are ready to be produced to defense counsel
6/4/2015	MD	0.3	md review list of outstanding discovery and email defense counsel 0.3
6/4/2015	ME	0.4	review documents recently produced by defense counsel to prepare for meeting with team attorney regarding outstanding discovery
6/4/2015	MD	0.3	md drafting motion to compel 0.3
6/5/2015	ME	0.4	prepare amended answers to interrogatories for production
6/5/2015	ME	0.2	Bates stamp opt-in plaintiff documents to prepare for production to defense counsel
6/5/2015	ME	0.2	file newly received opt-in documents
6/5/2015	MD	0.3	md drafting motion to compel 0.3
6/5/2015	ME	0.1	respond to email from opt-in claimant regarding updated contact information
6/5/2015	ME	0.2	draft amended answer to interrogatories for opt-in plaintiff to review before producing to defense counsel
6/5/2015	JP	0.1	JLP/ME discuss opt-in documents preparation for production to defense counsel
6/5/2015	ME	0.3	redact privileged information from opt-in plaintiff documents
6/5/2015	ME	0.4	prepare emails to send to opt-in plaintiffs who need to review their amended answers to interrogatories before producing to defense counsel
6/5/2015	ME	0.1	track plaintiff documents produced to defense counsel
6/5/2015	ME	0.1	organize server files of documents produced to defense counsel today
6/5/2015	ME	0.1	draft amended answer to interrogatories for opt-in plaintiff to review before producing to defense counsel



Date	Staff	Amount of Time	Description
6/5/2015	ME	1.5	DG/MR/MD/JLP/ME litigation team meeting to review recently discovery documents recently produced by defense counsel .3; determine discovery that is needed 3.; decide on possible deponents .3.; develop rough deposition timeline .1; brainstorm possible expert witnesses 3.; and delegate related tasks for each .2
6/5/2015	ME	0.2	draft amended answer to interrogatories for opt-in plaintiff upon plaintiff's request
6/5/2015	JP	1.5	DG/MR/MD/JLP/ME litigation team meeting to review recently discovery documents recently produced by defense counsel .3; determine discovery that is needed 3.; decide on possible deponents .3.; develop rough deposition timeline .1; brainstorm possible expert witnesses 3.; and delegate related tasks for each .2
6/5/2015	DG	1.5	DG/MR/MD/JLP/ME litigation team meeting to review recently discovery documents recently produced by defense counsel .3; determine discovery that is needed 3.; decide on possible deponents .3.; develop rough deposition timeline .1; brainstorm possible expert witnesses 3.; and delegate related tasks for each .2
6/5/2015	CLER	0.2	create PDF format of documents recd from client
6/5/2015	MR	1.5	DG/MR/MD/JLP/ME litigation team meeting to review recently discovery documents recently produced by defense counsel .3; determine discovery that is needed 3.; decide on possible deponents .3.; develop rough deposition timeline .1; brainstorm possible expert witnesses 3.; and delegate related tasks for each .2
6/5/2015	MD	1.5	DG/MR/MD/JLP/ME litigation team meeting to review recently discovery documents recently produced by defense counsel .3; determine discovery that is needed 3.; decide on possible deponents .3.; develop rough deposition timeline .1; brainstorm possible expert witnesses 3.; and delegate related tasks for each .2
6/5/2015	ME	0.4	prepare amended answers to interrogatories for production
6/5/2015	MD	0.2	MD/ME meeting to discuss plaintiff production
6/5/2015	ME	0.1	JLP/ME discuss opt-in documents preparation for production to defense counsel
6/5/2015	ME	0.1	email opt-in plaintiff about selecting which questions answers should be used to create their answer to interrogatories
6/5/2015	ME	0.2	MD/ME meeting to discuss plaintiff production
6/5/2015	ME	0.5	review opt-in plaintiff documents
6/5/2015	ME	0.2	enter tasks to be completed into time matters for each litigation team member
6/8/2015	MD	0.2	md/dg discussing discovery requests and motion to compel documents, including time studies 0.2
6/8/2015	ME	0.2	review information about Kellogg's use of Direct Store Delivery from public sources
6/8/2015	ME	0.1	MD/ME discuss edits to the sixth document request and first request for admission draft
6/8/2015	ME	0.3	save emails from opt-in plaintiffs regarding amended answers to interrogatories
6/8/2015	JP	1.2	JLP/ME meeting to review answers to interrogatories .2; amended answers to interrogatories .8; and document status of production .2
6/8/2015	DG	0.2	md/dg discussing discovery requests and motion to compel documents, including time studies 0.2

Date	Staff	Amount of Time	Description
6/8/2015	ME	0.7	verify that workers' compensation document produced by defense counsel includes only opt-ins who have workers' comp claims
6/8/2015	DG	0.8	draft 7th Req to Produce and First Request for Admissions - re DSD purposes .8
6/8/2015	ME	0.3	analyze workers' compensation document that was produced by defense counsel
6/8/2015	MD	0.1	MD/ME discuss edits to the sixth document request and first request for admission draft
6/8/2015	ME	0.1	JS/ME explain filings and docket folders
6/8/2015	ME	0.1	add edit to sixth document request and first request for admission
6/8/2015	ME	0.1	reply to email from opt-in regarding sending documents to our office
6/8/2015	JS	0.1	JS/ME explain filings and docket folders
6/8/2015	ME	0.2	review draft of 7th Request to Produce and first Request for Admission
6/8/2015	ME	1.2	JLP/ME meeting to review answers to interrogatories .2; amended answers to interrogatories .8; and document status of production .2
6/8/2015	ME	0.4	organize emails sent by litigation team and opt-ins
6/8/2015	ME	0.1	telephone call with opt-in plaintiff for case update
6/8/2015	MD	0.5	drafting motion to compel 0.5
6/9/2015	ME	1	review opt-in plaintiff documents responsive to interrogatories
6/9/2015	CLER	0.7	create PDF format of documents recd from client
6/9/2015	ME	0.2	draft amended answer to interrogatories for opt-in upon opt-in's request
6/9/2015	ME	0.2	draft amended answer to interrogatories for opt-in plaintiff based upon opt-in's request to do so
6/9/2015	ME	0.2	reply to opt-in's email regarding documents responsive to interrogatories
6/9/2015	ME	0.5	analyze tracking spreadsheet for plaintiff answers to interrogatories to determine whose answers have not yet been produced and why
6/9/2015	ME	0.2	ensure that opt-in plaintiffs' email requests to amend answers to interrogatories have been saved
6/9/2015	ME	0.1	organize emails
6/9/2015	MD	0.5	md researching other companies who were sued because they misclassified their sales representatives 0.5
6/9/2015	ME	0.1	save recently received opt-in plaintiff documents on server
6/9/2015	ME	0.4	analyze tracking spreadsheet for plaintiffs' answers to interrogatories to determine status of interrogatories responses
6/9/2015	ME	0.1	save recently received consent to sue on server
6/10/2015	ME	0.3	redact privileged information from emails sent by opt-in plaintiff to be produced to defense counsel
6/10/2015	ME	0.4	review status of documents needed from opt-in plaintiffs who have recently completed their answers to interrogatories
6/10/2015	DG	0.1	dg/md discuss next steps on motion to compel .1
6/10/2015	ME	0.4	review public information about sales rep misclassification
6/10/2015	MD	0.2	md edit FOIA request 0.2
6/10/2015	ME	0.6	review opt-in plaintiffs' documents responsive to interrogatories
6/10/2015	ME	0.6	verify that all opt-in plaintiff documents to be produced to defense counsel have been properly filed on drive
6/10/2015	JS	0.6	create brief guide and assemble resources for paralegal use when formulating W&H FOIA requests
6/10/2015	ME	0.2	review list of opt-in plaintiffs who still need to send us their documents that are responsive to the interrogatories
6/10/2015	DG	0.5	review article by Mumin Kurtulus for possible use as expert .5

Date	Staff	Amount of Time	Description
6/10/2015	ME	0.6	save scanned document of opt-in plaintiff's documents as separate categorized documents for ease of future reference
6/10/2015	MR	0.1	search legal research folder for Nabisco reference
6/10/2015	MD	0.1	md email ME about seeking FOIA of Nabisco settlement 0.1
6/10/2015	JS	0.3	assemble FOIA req resources for ME (W&H Whisard / template requests, contact information)
6/10/2015	MD	0.5	md drafting motion ot compel documents 0.5
6/11/2015	ME	0.5	search for case information to use in FOIA request
6/11/2015	ME	0.2	telephone conversation with opt-in for case update
6/11/2015	JP	0.1	JP/MR discuss Hours of Service documents in training manual
6/11/2015	JS	0.2	discuss process for creating a FOIA request
6/11/2015	ME	0.2	discuss process for creating a FOIA request
6/11/2015	JS	0.4	assist in drafting FOIA req re: Nabisco misclassification
6/11/2015	ME	0.2	telephone call with opt-in plaintiff regarding documents responsive to interrogatories .1; notes from conversation .1
6/11/2015	ME	0.1	search for ESI deposition transcript
6/11/2015	ME	0.4	finish draft of FOIA request for attorney review
6/11/2015	MD	4.5	md drafting motion to compel 4.5
6/11/2015	ME	0.1	download Nabisco settlement article to attach to FOIA request to the DOL
6/11/2015	ME	0.4	review Direct Store Delivery information sent by research librarian
6/11/2015	MR	0.1	JP/MR discuss Hours of Service documents in training manual
6/11/2015	ME	0.1	review email from defense counsel regarding discovery issues
6/11/2015	ME	0.5	review information about how to create and submit a FOIA request
6/11/2015	MR	0.7	search Defendant docs and client docs using dtsearch for keyword "scorecard" .3, for keyword "report card" .1, examine hours of service documents .3
6/11/2015	ME	0.6	review motion to compel for edits
6/11/2015	ME	0.2	review opt-in plaintiff documents to prepare for producing to defense counsel
6/11/2015	ME	0.2	begin to draft FOIA request
6/11/2015	ME	0.1	save opt-in plaintiff's documents that are responsive to interrogatories
6/11/2015	ME	0.3	separate scanned client documents into categories .2; and Bates stamp .2
6/12/2015	ME	0.1	organize emails regarding case
6/12/2015	ME	0.3	file opt-in plaintiffs' documents that were produced to defense counsel today in proper location on server
6/12/2015	ME	0.3	search for exhibits from Nilles deposition that need to be sent to court reporter
6/12/2015	MD	0.2	md read email from defense counsel and respond 0.2
6/12/2015	ME	0.4	search Kaminski deposition transcript for any exhibits that need to be sent to court reporter
6/12/2015	ME	0.1	update spreadsheet to track opt-in plaintiffs' documents that were produced
6/12/2015	JS	0.4	prepare and send FOIA request; save receipt
6/12/2015	DG	0.2	edit website statement of case for clients .2
6/12/2015	ME	0.3	review questions I have about production of documents to prepare for meeting with JP
6/12/2015	ME	0.1	update spreadsheet to track opt-in plaintiffs' produced answers to interrogatories
6/12/2015	ME	0.3	index documents produced by defense counsel
6/12/2015	MD	0.1	md respond to JS about FOIA request 0.1
6/12/2015	ME	1	prepare opt-in plaintiff's documents for production
6/12/2015	ME	0.1	update spreadsheet to track opt-in plaintiffs' produced amended answers to interrogatories

Date	Staff	Amount of Time	Description
6/12/2015	ME	0.2	prepare opt-in plaintiffs' answers to interrogatories for production
6/12/2015	ME	0.3	prepare opt-in plaintiff's amended answers to interrogatories for production
6/12/2015	MR	0.3	locate source of hours of service and macro code documents .1, review macro code docs .1
6/15/2015	ME	0.4	Bates stamp opt-in's documents to prepare to produce to defense counsel
6/15/2015	JP	0.5	JLP/ME meeting to review specifics of process for producing opt-in's documents to defense counsel
6/15/2015	ME	0.2	create FedEx label .1; and email label to opt-in .1
6/15/2015	ME	0.5	JLP/ME meeting to review specifics of process for producing opt-in's documents to defense counsel
6/15/2015	ME	0.2	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/15/2015	ME	0.2	Bates stamp opt-in plaintiff's documents to prepare for production for defense counsel
6/15/2015	ME	0.4	break out opt-in documents that contain possibly privileged information so that opt-in can be called to verify
6/15/2015	JS	0.1	save DoL WHD acknowledgment of FOIA Request
6/15/2015	JP	0.6	JLP/ME meeting to review production of opt-ins' documents that are responsive to interrogatories
6/15/2015	ME	0.2	break out opt-in's documents into categories for ease of referencing later
6/15/2015	ME	0.5	update tracking spreadsheet for plaintiffs' answers to interrogatories to include information about documents that contain privileged information
6/15/2015	ME	0.3	prepare list of topics to review at today's paralegal meeting
6/15/2015	ME	0.2	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/15/2015	ME	0.6	JLP/ME meeting to review production of opt-ins' documents that are responsive to interrogatories
6/15/2015	ME	0.1	file opt-in's documents as privileged information for attorney's review
6/15/2015	ME	0.2	review opt-in documents to determine which are ready to prepare for production for defense counsel
6/15/2015	ME	0.1	scan recently received opt-in documents
6/16/2015	ME	0.1	verify if opt-in's documents have been produced to defense counsel
6/16/2015	ME	0.1	email JP about producing opt-ins' answers to interrogatories
6/16/2015	ME	0.3	create amended answer to interrogatories for opt-in plaintiff upon opt-in's request
6/16/2015	ME	0.1	update answers to interrogatories tracking spreadsheet to include note regarding opt-in's desire to not send documents
6/16/2015	ME	0.7	compile electronic exhibits used in defendant depositions that need to be sent to court reporter
6/16/2015	ME	0.3	save emails sent to opt-ins in Time Matters
6/16/2015	ME	0.2	create amended answer to interrogatories for opt-in based upon opt-in's request
6/16/2015	ME	1.3	review emails from opt-ins to ensure that there are no outstanding issues that need attention
6/16/2015	MD	0.3	md editing motion to compel 0.3
6/16/2015	JP	0.1	JLP/ME discuss opt-ins' documents that require attorney's review
6/16/2015	ME	0.5	review public information about the United Food and Commercial Workers' involvement with direct store delivery employees
6/16/2015	MD	1.5	md editing motion to compel discovery 1.5
6/16/2015	MD	0.2	MD/ME meeting to discuss the production of opt-in's documents to defense counsel.1; review electronic exhibits from defendant depositions that need to be sent to court reporter .1

Date	Staff	Amount of Time	Description
6/16/2015	ME	0.1	email MD about opt-in documents that require his review
6/16/2015	ME	0.1	JLP/ME discuss opt-ins' documents that require attorney's review
6/16/2015	ME	0.2	MD/ME meeting to discuss the production of opt-in's documents to defense counsel.1; review electronic exhibits from defendant depositions that need to be sent to court reporter .1
6/17/2015	MD	0.1	md email ME about calculating time left for depositions 0.1
6/17/2015	ME	0.3	review second request to admit for needed edits
6/17/2015	ME	0.1	Bates stamp opt-in's document
6/17/2015	ME	0.8	compile deposition transcript references to digital exhibits so that defense counsel can review before sending digital exhibits to stenographer
6/17/2015	CLER	0.2	create PDF format of documents recd from client
6/17/2015	ME	0.3	review seventh document request draft for needed edits
6/17/2015	CLER	0.5	create PDF format of documents recd from client
6/17/2015	ME	0.1	email to opt-in regarding sending documents that are responsive to interrogatories to our office
6/17/2015	ME	0.2	troubleshoot file error with deposition transcript
6/17/2015	ME	0.1	left voicemail for opt-in regarding sending documents that are responsive to interrogatories to our office
6/17/2015	ME	0.1	telephone call to opt-in regarding sending documents to our office that are responsive to interrogatories
6/17/2015	JP	0.5	MD/JLP/ME litigation team meeting to discuss status of outstanding defendant discovery .1; status of plaintiff's answers to interrogatories .2; timeline for upcoming depositions .1; and tasks to complete .1
6/17/2015	MD	0.5	MD/JLP/ME litigation team meeting to discuss status of outstanding defendant discovery .1; status of plaintiff's answers to interrogatories .2; timeline for upcoming depositions .1; and tasks to complete .1
6/17/2015	ME	0.1	attempted telephone call to opt-in regarding sending us documents that are responsive to interrogatories
6/17/2015	ME	0.1	left voice mail for opt-in plaintiff regarding sending documents that are responsive to interrogatories to our office
6/17/2015	ME	0.5	MD/JLP/ME litigation team meeting to discuss status of outstanding defendant discovery .1; status of plaintiff's answers to interrogatories .2; timeline for upcoming depositions .1; and tasks to complete .1
6/17/2015	ME	0.8	format spreadsheet created to track phone calls to opt-in plaintiff's who need to send us their documents that are responsive to interrogatories
6/17/2015	ME	0.1	telephone call to opt-in regarding sending documents that are responsive to interrogatories to our office
6/17/2015	ME	0.4	create updated list of opt-in plaintiffs who have still not sent us their documents that are responsive to the interrogatories
6/17/2015	ME	0.2	redact privileged information from opt-in's documents to prepare to produce to defense counsel
6/17/2015	ME	0.1	left message for opt-in regarding sending documents that are responsive to interrogatories to our office
6/17/2015	MD	1.5	md drafting seventh document demand and second requests to admit 1.5
6/17/2015	ME	0.1	telephone call to opt-in regarding sending documents that are responsive to interrogatories to our office
6/17/2015	ME	0.1	email to opt-in regarding sending documents to our office
6/17/2015	ME	0.1	left message for opt-in regarding sending documents that our responsive to interrogatories to our office

Date	Staff	Amount of Time	Description
6/17/2015	ME	0.1	attempted telephone call to opt-in regarding sending documents that are responsive to interrogatories to our office
6/17/2015	ME	0.1	left voicemail from opt-in regarding sending documents that are responsive to interrogatories to our office
6/17/2015	ME	0.1	attempted telephone call to opt-in regarding sending documents responsive to interrogatories to our office
6/17/2015	ME	0.1	left message for opt-in regarding sending documents that are responsive to interrogatories to our office
6/18/2015	ME	0.1	update tracking spreadsheet to indicate documents that have been recently provided by opt-ins
6/18/2015	ME	0.2	file newly received opt-in documents on server
6/18/2015	ME	0.2	review opt-in's documents for completeness so that they can be returned to opt-in
6/18/2015	ME	0.1	review opt-in's documents that were recently received
6/18/2015	ME	0.5	begin to calculate time remaining for future depositions with deponents who have previously been deposed
6/18/2015	CLER	0.1	file hard copies of opt-in's documents
6/18/2015	ME	0.1	email opt-in to verify that we have received documents
6/18/2015	ME	0.1	email MD details regarding client documents to review
6/18/2015	ME	0.1	review opt-in's documents that were recently received
6/18/2015	ME	0.2	MA/ME demonstrate process of posting case update to website
6/18/2015	MA	0.2	MA/ME demonstrate process of posting case update to website
6/18/2015	ME	0.1	respond to opt-in's email regarding case update
6/18/2015	ME	1	enter start/end and off/on record times for previously taken depositions in order to calculate remaining time for future depositions
6/18/2015	ME	0.8	calculate deposition time remaining from defendant depositions that have been previously taken
6/18/2015	MD	0.5	md preparing deposition schedule for 0.5
6/19/2015	MD	0.1	md email plaintiff's attorney in pending ME FLSA RSR cases 0.1
6/19/2015	JS	0.1	call from plt for JP
6/19/2015	MD	0.1	md email defense counsel about outstanding documents 0.1
6/22/2015	ME	0.1	telephone call with opt-in regarding requesting FedEx label to send remaining documents to our office
6/22/2015	DG	0.2	review date availability for a string of Kellogg depositions .2
6/22/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
6/22/2015	ME	0.1	email opt-in regarding amended answer to interrogatories
6/22/2015	DG	1.5	edit motion to compel 1.5
6/22/2015	ME	0.1	save/file opt-in plaintiff's documents that were sent via email
6/22/2015	ME	0.3	telephone call with opt-in plaintiff regarding documents responsive to interrogatories .2; notes from conversation .1
6/22/2015	ME	1.3	save/file optin's documents that were sent to our office via email
6/22/2015	ME	0.2	email FedEx label to opt-in plaintiff to use to send documents to our office
6/23/2015	ME	0.4	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	ME	0.9	redact privileged information from opt-in's documents to prepare documents for producing to defense counsel
6/23/2015	ME	1.1	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	ME	0.2	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	ME	0.2	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	ME	0.2	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	MD	1	md editing motion to compel 1.0



Date	Staff	Amount of Time	Description
6/23/2015	ME	0.3	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	CLER	1.8	create pdf's of opt-in's forwarded emails to prepare for producing to defense counsel
6/23/2015	ME	0.5	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	ME	0.3	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	ME	0.3	Bates stamp opt-in's documents to prepare for producing to defense counsel
6/23/2015	DG	0.6	edit motion to compel .6
6/24/2015	ME	0.2	draft questions to ask opt-in about documents of interest
6/24/2015	MD	0.2	md scheduling depositions 0.2
6/24/2015	MD	3	md editing motion to compel documents 3.0
6/24/2015	ME	0.1	left voicemail for opt-in regarding sending us documents that are responsive to interrogatories
6/24/2015	ME	0.1	email to opt-in regarding needing updated telephone number
6/24/2015	ME	0.3	review documents received by opt-in plaintiff
6/24/2015	CLER	0.7	create PDF format of documents recd from client
6/24/2015	ME	0.1	attempt telephone call to opt-in regarding sending documents responsive to interrogatories to our office
6/24/2015	MD	0.1	md respond to JP about intake for new client 0.1
6/24/2015	ME	0.5	DG/MD/MR/ME litigation team meeting to review documents received from opt-in .3; overview of case progress and schedule .2
6/24/2015	ME	0.5	begin to break out recently received opt-in documents into categories
6/24/2015	ME	0.1	telephone call with opt-in requesting that he send us his documents that are responsive to the interrogatories
6/24/2015	CLER	0.2	prepare FedEx label to mail to opt-in
6/24/2015	ME	0.1	email to opt-in regarding sending documents responsive to interrogatories to our office
6/24/2015	ME	0.1	contacted opt-in via phone and email regarding sending documents responsive to interrogatories to our office
6/24/2015	ME	0.1	left voicemail for opt-in regarding sending documents to our office
6/24/2015	MD	0.5	DG/MD/MR/ME litigation team meeting to review documents received from opt-in .3; overview of case progress and schedule .2
6/24/2015	DG	0.5	DG/MD/MR/ME litigation team meeting to review documents received from opt-in .3; overview of case progress and schedule .2
6/24/2015	MR	0.5	DG/MD/MR/ME litigation team meeting to review documents received from opt-in .3; overview of case progress and schedule .2
6/24/2015	ME	0.1	left voicemail for opt-in regarding sending us documents that are responsive to interrogatories
6/24/2015	ME	0.1	email to opt-in regarding sending documents responsive to interrogatories
6/24/2015	ME	0.1	send email to opt-in so that he can reply with his documents that are responsive to interrogatories attached
6/24/2015	ME	0.4	telephone call with opt-in regarding sending documents to our office .3; notes from conversation .2; update contact information .1
6/24/2015	MD	0.3	md researching status of Kehe case and reviewing court filings 0.3
6/24/2015	ME	0.1	attempted to call opt-in regarding questions about his documents (telephone number no longer in service)
6/24/2015	ME	0.3	review opt-ins' document status for interrogatories to determine how many still need to be contacted regarding sending documents to our office
6/25/2015	ME	0.2	review opt-in personnel file produced by defense counsel to determine when opt-in started in current position
6/25/2015	ME	0.5	put opt-in's scanned document into chronological order

Date	Staff	Amount of Time	Description
6/25/2015	ME	0.1	contacted opt-in regarding sending documents to our office via voicemail and email
6/25/2015	ME	0.2	determine who is the in-house counsel for Nabisco for future contact
6/25/2015	ME	0.5	review opt-in documents to prepare for producing to defense counsel
6/25/2015	ME	0.1	contacted opt-in regarding sending documents responsive to interrogatories to our office via voicemail and email
6/25/2015	CLER	0.2	prepare FedEx label for opt-in
6/25/2015	DG	1.2	edit MTC brief 1.2
6/25/2015	ME	0.3	telephone call with opt-in regarding sending documents responsive to interrogatories to our office and case update .2; notes from conversation .1
6/25/2015	ME	0.5	determine chronological order for opt-in's documents
6/25/2015	ME	0.2	finish breaking opt-in's digital documents into appropriate categories for organizational/filing purposes
6/25/2015	ME	0.4	continue to search for name and contact information of in-house counsel at Nabisco
6/25/2015	ME	0.3	Bates stamp opt-in's documents to prepare to produce to defense counsel
6/26/2015	DG	0.3	md/dg discussing settlement conversation with defense counsel and noticing 2 day 30b6 deposition of Kellogg for Morning Foods and Snacks side 0.3
6/26/2015	MD	0.2	MD/ME discuss exhibit preparation needed for motion to compel
6/26/2015	ME	0.4	AG/ME training regarding using Pacer to find relevant case documents
6/26/2015	ME	0.7	review opt-in documents to determine which are useful to support OSE Argument
6/26/2015	MD	0.3	md/dg discussing settlement conversation with defense counsel and noticing 2 day 30b6 deposition of Kellogg for Morning Foods and Snacks side 0.3
6/26/2015	AG	0.4	AG/ME training regarding using Pacer to find relevant case documents
6/26/2015	MD	0.1	md/dg discuss md call with defense counsel about discovery and settlement 0.1
6/26/2015	JP	0.1	md/jp discussing potential settlement discussions 0.1
6/26/2015	MR	0.1	DG/MR discuss Hersey overtime lawsuit .1
6/26/2015	ME	0.2	MD/ME discuss exhibit preparation needed for motion to compel
6/26/2015	ME	0.1	respond to email from opt-in regarding sent documents
6/26/2015	DG	0.1	md/dg discuss md call with defense counsel about discovery and settlement 0.1
6/26/2015	DG	0.6	edit motion to compel .5; review Hershey v Campanelli .1
6/26/2015	ME	1.7	prepare exhibits for Motion to Compel
6/26/2015	CLER	0.3	file hard copies of opt-ins' documents
6/26/2015	ME	0.3	prepare amended answers to interrogatories for production to defense counsel
6/26/2015	MR	0.2	briefly read Westlaw research on Hersey lawsuit
6/26/2015	DG	0.5	dg/ms discuss how to prove sales is not primary duty for OSE .5
6/26/2015	DG	0.1	DG/MR discuss Hershey overtime lawsuit .1
6/26/2015	MD	0.1	md/jp discussing potential settlement discussions 0.1
6/26/2015	ME	0.2	file opt-in documents produced to defense counsel today .2
6/26/2015	MD	3	md finalizing motion to compel documents 3.0
6/26/2015	MS	0.5	dg/ms discuss how to prove sales is not primary duty for OSE .5
6/26/2015	ME	0.5	prepare opt-in documents to produce to defense counsel
6/26/2015	ME	0.8	prepare exhibits for Motion to Compel
6/26/2015	AG	0.3	prepare ltr (mailing of return of [client]. documents)
6/26/2015	MD	0.2	md speak with defense counsel about outstanding discovery and settlement 0.2

Date	Staff	Amount of Time	Description
6/26/2015	MD	0.1	md call with defense counsel about discovery production 0.1
6/26/2015	ME	0.3	save opt-in documents in proof chart of supporting documents .1; create notes regarding the significance of saved documents .2
6/29/2015	ME	0.8	JLP/ME meeting to review case status and tasks needed to complete
6/29/2015	JP	0.2	JP/MR review timeline and steps to create initial disclosures
6/29/2015	JP	0.8	JLP/ME meeting to review case status and tasks needed to complete
6/29/2015	ME	0.7	Bates stamp opt-in documents to prepare for producing to defense counsel
6/29/2015	ME	1.2	review opt-in documents to gain knowledge of documents and to determine which are useful to support OSE Argument
6/29/2015	MR	0.2	JP/MR review timeline and steps to create initial disclosures
6/29/2015	ME	0.3	edit tracking spreadsheet to determine time remaining for defendant depositions
6/29/2015	ME	0.4	telephone call with opt-in regarding sending documents responsive to interrogatories to our office and information regarding opt-in's employment experience .3; notes from conversation .1
6/29/2015	ME	0.2	save opt-in document in proof chart folder .1; write description of document for future reference .1
6/30/2015	ME	0.1	called opt-in regarding documents - left voicemail
6/30/2015	ME	0.3	review documents produced by defense counsel
6/30/2015	ME	0.1	prepare for telephone call with opt-in regarding questions about their documents
6/30/2015	ME	0.1	listen to voicemail from opt-in regarding sending documents to our office
6/30/2015	MR	3.8	perform web research on similar cases of RSR/DSD 3.0, save cases to case folder on server .8
6/30/2015	ME	0.1	returned call to opt-in; left voicemail
6/30/2015	ME	0.1	download/save documents produced by defense counsel
6/30/2015	ME	0.1	email links to documents produced by defense counsel to JP
6/30/2015	ME	0.1	send documents produced by defense counsel to MD
6/30/2015	CLER	0.3	prepare FedEx label to mail to opt-in
7/1/2015	CLER	0.2	create PDF format of documents recd from client
7/1/2015	MR	0.3	MR/ME review emails produced by defense counsel .2; discuss location to file on server .1
7/1/2015	ME	0.3	MR/ME review emails produced by defense counsel .2; discuss location to file on server .1
7/1/2015	ME	0.2	save documents produced by defense counsel to server
7/2/2015	ME	0.1	telephone call with opt-in regarding retaliation questions
7/6/2015	ME	0.1	attempt to contact opt-in via phone regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.1	email to opt-in regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.1	email to opt-in regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.1	telephone call with opt-in regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.1	left voicemail for opt-in regarding calling our office to speak with him regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.2	review spreadsheet of opt-ins who need to be called regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.1	sent text to opt-in requesting he call the office so that we can speak with him about sending documents responsive to interrogatories to our office

Date	Staff	Amount of Time	Description
7/6/2015	ME	0.1	left voicemail for opt-in regarding sending documents responsive to interrogatories to our office
7/6/2015	MR	0.2	read SCOTUS ruling on Christopher v SmithBeecham
7/6/2015	ME	0.1	left voicemail for opt-in regarding calling our office so that we can speak with him about sending documents that are responsive to interrogatories to our office
7/6/2015	ME	0.1	sent email to opt-in regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.1	left voicemail for opt-in regarding following up with email sent by opt-in on Friday
7/6/2015	ME	0.1	email opt-in regarding sending documents responsive to interrogatories to our office
7/6/2015	ME	0.6	telephone call with opt-in regarding sending documents responsive to interrogatories to our office and opt-in's experience while employed by defendant .5; notes from conversation .1
7/6/2015	ME	0.1	left voicemail for opt-in regarding sending documents to our office
7/6/2015	ME	0.3	draft language to text to opt-ins who have not yet sent their documents to our office
7/6/2015	ME	0.1	respond to opt-in's email regarding request for amended answer to interrogatories
7/7/2015	ME	0.2	search public information for information about Nabisco overtime lawsuit
7/9/2015	ME	1.2	prepare opt-in documents for production to defense counsel
7/9/2015	ME	0.2	respond to opt-in's email requesting a case update
7/9/2015	JS	0.1	call from plt--sent to jp vm
7/9/2015	MD	2	md edit and file motion to compel document 2.0
7/9/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
7/10/2015	MD	0.2	md email defense counsel about rescheduling depositions 0.2
7/10/2015	MD	0.1	md email defense counsel about outstanding pay records 0.1
7/10/2015	ME	0.5	prepare .4; and produce documents to defense counsel .1
7/10/2015	DG	0.6	md/dg discussing deposition dates of Kellogg witnesses 0.2; review time study provided in discovery .4
7/10/2015	MD	1	md review defendant's document production 1.0
7/10/2015	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy (Docket#311 - MOTION to Compel Discovery by Plaintiff Patty Thomas. (Attachments: # (1) Exhibit 1, # (2) Exhibit 2, # (3) Exhibit 3, # (4) Exhibit 4, # (5) Exhibit 5, # (6) Exhibit 6, # (7) Exhibit 7, # (8) Exhibit 8, # (9) Exhibit 9, # (10) Exhibit 10, # (11) Exhibit 11, # (12) Exhibit 12, # (13) Proposed Order) Noting Date 7/24/2015, (Dunn, Matt)
7/10/2015	MD	0.2	md/dg discussing deposition dates of Kellogg witnesses 0.2
7/10/2015	ME	0.1	MD/ME discuss recently received production from defense counsel
7/10/2015	CLER	0.5	create PDF format of document recd from client
7/10/2015	ME	0.1	update tracking spreadsheet to reflect documents produced to defense counsel today
7/10/2015	MD	0.1	MD/ME discuss recently received production from defense counsel
7/13/2015	CLER	0.1	create PDF format of CTS recd
7/13/2015	CLER	0.1	Data Entry of contact information
7/13/2015	ME	0.7	break out opt-in's scanned documents into separate categories of documents
7/13/2015	ME	0.2	reschedule litigation team meeting
7/13/2015	ME	0.2	review current status of opt-ins interrogatory responses/document production
7/13/2015	ME	0.1	file opt-in's electronic documents

Date	Staff	Amount of Time	Description
7/13/2015	ME	0.1	file opt-in's electronic documents
7/13/2015	ME	0.9	download and extract documents produced by defense counsel
7/13/2015	ME	0.1	MD/ME discuss rescheduling litigation team meeting
7/13/2015	MD	0.1	MD/ME discuss rescheduling litigation team meeting
7/14/2015	ME	0.1	email deposition notice to MD for review
7/14/2015	MD	0.1	md email with KY Plaintiffs' counsel about case status 0.1
7/14/2015	MD	0.1	md/dg discuss results of call with plaintiffs' counsel from Maine case 0.1
7/14/2015	MD	0.1	MD/ME discuss how to file recently received consent to sue form
7/14/2015	DG	0.8	DG/JLP/MD/MR/ME litigation team meeting to discuss gathering information regarding former Nabisco FLSA lawsuit .2; tracking of other FLSA cases against Kellogg .1; plaintiff discover status .1; defendant discovery status .1; possible deponents .2; refining primary job duty statement .1
7/14/2015	MD	0.8	DG/JLP/MD/MR/ME litigation team meeting to discuss gathering information regarding former Nabisco FLSA lawsuit .2; tracking of other FLSA cases against Kellogg .1; plaintiff discover status .1; defendant discovery status .1; possible deponents .2; refining primary job duty statement .1
7/14/2015	ME	0.1	MD/ME discuss how to file recently received consent to sue form
7/14/2015	DG	0.1	md/dg discuss results of call with plaintiffs' counsel from Maine case 0.1
7/14/2015	JP	0.8	DG/JLP/MD/MR/ME litigation team meeting to discuss gathering information regarding former Nabisco FLSA lawsuit .2; tracking of other FLSA cases against Kellogg .1; plaintiff discover status .1; defendant discovery status .1; possible deponents .2; refining primary job duty statement .1
7/14/2015	MR	0.8	DG/JLP/MD/MR/ME litigation team meeting to discuss gathering information regarding former Nabisco FLSA lawsuit .2; tracking of other FLSA cases against Kellogg .1; plaintiff discover status .1; defendant discovery status .1; possible deponents .2; refining primary job duty statement .1
7/14/2015	ME	0.7	search Pacer for FLSA class action lawsuits against Nabisco
7/14/2015	MD	0.3	MD/ME draft agenda for litigation team meeting
7/14/2015	ME	0.3	MD/ME draft agenda for litigation team meeting
7/14/2015	JS	0.3	plt call for contact info update and to speak with JP about an issue
7/14/2015	DG	0.2	review new retainer, sign .2
7/14/2015	MD	0.4	md/dg call with plaintiffs' counsel for case in ME about his case and litigation with same defense counsel 0.4
7/14/2015	ME	0.1	check status of DOL FOIA request
7/14/2015	MD	2.5	md drafting statement of facts 2.5
7/14/2015	MD	0.1	md write defense counsel about meeting and conferring about 30b6 ESI deposition 0.1
7/14/2015	ME	0.2	draft agenda for litigation team meeting
7/14/2015	DG	0.1	md/dg discussing call with counsel in other Kellogg case 0.1
7/14/2015	MD	0.1	md scheduling call with defense counsel 0.1
7/14/2015	MD	0.1	md/dg discussing call with counsel in other Kellogg case 0.1
7/14/2015	MD	0.2	md email exchange with defense counsel about producing wage records 0.2
7/14/2015	MD	0.1	md email with plaintiffs counsel about speaking about case 0.1
7/14/2015	ME	0.2	prepare deposition notice
7/14/2015	MD	0.4	md researching pending FLSA cases against Kellogg
7/14/2015	DG	0.4	md/dg call with plaintiffs' counsel for case in ME about his case and litigation with same defense counsel 0.4

Date	Staff	Amount of Time	Description
7/14/2015	ME	0.8	DG/JLP/MD/MR/ME litigation team meeting to discuss gathering information regarding former Nabisco FLSA lawsuit .2; tracking of other FLSA cases against Kellogg .1; plaintiff discover status .1; defendant discovery status .1; possible deponents .2; refining primary job duty statement .1
7/14/2015	MD	0.1	MD/ME discuss following up with Department of Labor regarding Nabisco case
7/14/2015	ME	0.1	MD/ME discuss following up with Department of Labor regarding Nabisco case
7/14/2015	ME	0.3	download and save documents produced by defense counsel
7/15/2015	CM	0.1	call from client re sending documents (.1)
7/15/2015	MD	0.3	md call with defense counsel about 30b6 ESI deposition 0.3
7/15/2015	MD	0.1	md review stipulation re extension of time and respond to defense counsel 0.1
7/15/2015	MD	0.2	md prepare for call with defense counsel 0.2
7/15/2015	MD	0.3	md/mr discussing testimony needed from 30b6 ESI dep 0.3
7/15/2015	MR	0.3	md/mr discussing testimony needed from 30b6 ESI dep 0.3
7/16/2015	MD	0.2	md/mr preparing for call with defense counsel about ESI deposition 0.2
7/16/2015	ME	0.3	telephone call with opt-in regarding case update .2; notes from conversation .1
7/16/2015	ME	0.1	locate documents for MR to review
7/16/2015	MR	0.2	md/mr preparing for call with defense counsel about ESI deposition 0.2
7/16/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#312 - STIPULATION AND PROPOSED ORDER RE STIPULATED MOTION TO EXTEND DEADLINES by parties re [311] MOTION to Compel Discovery (Nelson, James)
7/16/2015	MD	0.6	md/mr call with defense counsel about ESI deposition, outstanding discovery, and deposition of plaintiffs 0.6 (md 0.5)
7/16/2015	MR	0.5	md/mr call with defense counsel about ESI deposition, outstanding discovery, and deposition of plaintiffs 0.6 (md 0.5)
7/16/2015	MD	0.5	md review discovery production 0.5
7/16/2015	MD	0.1	MD/ME discuss status of documents recently produced by defense counsel
7/16/2015	ME	0.1	MD/ME discuss status of documents recently produced by defense counsel
7/16/2015	ME	0.1	MR/ME discuss passwords given by defense counsel to access discovery documents
7/16/2015	MR	0.1	MR/ME discuss passwords given by defense counsel to access discovery documents
7/16/2015	MD	0.2	md call with defense counsel about discovery issues 0.2
7/17/2015	ME	0.1	email MD regarding newly received Consent to Sue
7/17/2015	ME	0.1	email MR regarding password protected documents that were produced by defense counsel
7/17/2015	ME	0.1	attempt to access password protected documents produced by defense counsel
7/17/2015	MD	0.5	md reviewing and preparing documents for reply brief 0.5
7/17/2015	ME	0.2	troubleshoot issues with documents produced by defense counsel
7/20/2015	ME	0.1	IA email department of labor regarding status of FOIA request
7/20/2015	ME	0.1	left voicemail for opt-in regarding returning call about sending documents to our office
7/20/2015	ME	0.2	reply by email to opt-in regarding documents for answers to interrogatories .1
7/20/2015	ME	0.5	download documents produced by defense counsel .1; extract/save files .2; verify all have been successfully extracted .1
7/20/2015	MD	0.2	md review Kellogg's objections to plaintiffs discovery demands 0.2
7/21/2015	MD	0.2	md email exchange with defense counsel about meet and confer on discovery requests 0.2
7/21/2015	ME	0.2	review status of plaintiff production



Date	Staff	Amount of Time	Description
7/21/2015	MD	0.1	md review Kellogg's discovery objections 0.1
7/21/2015	ME	0.2	MD/ME discuss status of plaintiff production
7/21/2015	MD	0.4	md research Kellogg's in-house counsel and send email to person who knows in-house counsel 0.4
7/21/2015	MD	0.2	MD/ME discuss status of plaintiff production
7/21/2015	ME	1.5	Bates stamp opt-ins documents that are responsive to interrogatories to prepare documents for production to defense counsel
7/21/2015	MR	0.1	read and reply to email from para ME about dtSearch indexes of emails
7/21/2015	ME	0.2	review Defendants' Responses and Objections to Plaintiff's Seventh Document Demand
7/21/2015	ME	0.2	draft email to opt-ins regarding completing questions for answers to interrogatories
7/21/2015	ME	1	review opt-in documents to prepare documents for production to defense counsel
7/21/2015	MD	0.5	md reading articles on DSD 0.5
7/21/2015	ME	0.3	draft email to plaintiffs who have not yet sent their documents responsive to interrogatories
7/21/2015	ME	0.2	zip documents to be produced to defense counsel .1; send documents to defense counsel .1
7/21/2015	MD	0.1	md/dg discussing date for Logan Groulx deposition 0.1
7/21/2015	DG	0.1	md/dg discussing date for Logan Groulx deposition 0.1
7/21/2015	ME	0.2	review documents produced by opt-in that support case
7/22/2015	ME	0.1	email opt-in regarding sending documents to our office
7/22/2015	MR	0.2	check server to identify which Kellogg production is indexed on which external drives
7/22/2015	ME	0.1	text opt-in regarding sending documents to our office
7/22/2015	ME	0.1	email link to new questions responses to MR
7/22/2015	ME	0.1	download newest responses to questions for answers to interrogatories
7/22/2015			MD/DG/MR/JLP/ME litigation team meeting to discuss gathering facts from Nabisco case .1; tracking other Kellogg cases .2; status of and process for continuing plaintiff discovery .3; determining possible deponents .2; filing motion to compel discovery documents .1;
	ME	1.5	outstanding defendant discovery .3; continuing to define primary job duty .3
7/22/2015	ME	0.1	left voicemail with department of labor to follow up on FOIA request
7/22/2015	ME	0.4	review documents produced by defense counsel for all documents regarding injury statistics
7/22/2015	ME	1	filter and review information in interrogatory response tracking spreadsheet to compile list of opt-ins who need to be sent an email regarding completing questions for their answers to interrogatories
7/22/2015	ME	0.1	email opt-ins who need to complete questions for answers to interrogatories
7/22/2015			MD/DG/MR/JLP/ME litigation team meeting to discuss gathering facts from Nabisco case .1; tracking other Kellogg cases .2; status of and process for continuing plaintiff discovery .3; determining possible deponents .2; filing motion to compel discovery documents .1; outstanding defendant discovery .3; continuing to define primary job duty .3; draft discovery re outsourcing of Morning Food RSR work .3; review Acosta settlement information re OT .1
7/22/2015	DG	1.9	
7/22/2015	MD	0.2	MD/ME draft agenda for litigation team meeting

Date	Staff	Amount of Time	Description
7/22/2015	MD	1.5	MD/DG/MR/JLP/ME litigation team meeting to discuss gathering facts from Nabisco case .1; tracking other Kellogg cases .2; status of and process for continuing plaintiff discovery .3; determining possible deponents .2; filing motion to compel discovery documents .1; outstanding defendant discovery .3; continuing to define primary job duty .3
7/22/2015	MR	1.5	MD/DG/MR/JLP/ME litigation team meeting to discuss gathering facts from Nabisco case .1; tracking other Kellogg cases .2; status of and process for continuing plaintiff discovery .3; determining possible deponents .2; filing motion to compel discovery documents .1; outstanding defendant discovery .3; continuing to define primary job duty .3
7/22/2015	ME	0.2	MD/ME draft agenda for litigation team meeting
7/22/2015	ME	0.1	send email to opt-ins regarding completing questions for answers to interrogatories
7/22/2015	DG	0.1	dg/jp discuss K's request to mediate .1
7/22/2015	JP	1.5	MD/DG/MR/JLP/ME litigation team meeting to discuss gathering facts from Nabisco case .1; tracking other Kellogg cases .2; status of and process for continuing plaintiff discovery .3; determining possible deponents .2; filing motion to compel discovery documents .1; outstanding defendant discovery .3; continuing to define primary job duty .3
7/22/2015	ME	0.9	filter and review information in interrogatory response tracking spreadsheet to compile list of opt-ins who need to be sent an email regarding sending documents responsive to interrogatories to our office so they can be produced to defense counsel
7/22/2015	MD	0.6	md call with defense counsel about production of documents for DSD and other documents 0.6
7/22/2015	ME	0.1	review status of opt-in's interrogatory responses in order to contact opt-in regarding documents needed
7/22/2015	ME	0.3	file opt-in documents that were produced to defense counsel
7/22/2015	MD	0.2	md prepare for meet and confer 0.2
7/22/2015	ME	0.1	email opt-in regarding documents responsive to interrogatories
7/22/2015	ME	0.1	relocate transcript files for more efficient access
7/22/2015	MR	0.2	MR/ME discuss plan for indexing and searching opt-in emails that were produced by defense counsel
7/22/2015	ME	0.1	update tracking sheet to include newly received questions responses for answers to interrogatories
7/22/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#313 - ORDER granting [311] Stipulated Motion to Extend Deadlines re: [311] MOTION to Compel Discovery; new Nothing Date is 7/31/2015; signed by Judge Ronald B. Leighton.(DN)
7/22/2015	ME	0.1	update tracking spreadsheet to include opt-ins' documents most recently produced to defense counsel
7/22/2015	DG	0.1	md/dg discussing potential of mediation 0.1
7/22/2015	ME	0.1	email job duty formulation outlines to litigation team to review
7/22/2015	MD	2	md outlining motion to compel 2.0
7/22/2015	ME	0.2	MR/ME discuss plan for indexing and searching opt-in emails that were produced by defense counsel
7/22/2015	MD	0.1	md/dg discussing potential of mediation 0.1
7/23/2015	AN	0.2	Telephone call to opt-in re-questions
7/23/2015	ME	0.2	JLP/ME discuss involvement in damage calculations for mediation
7/23/2015	ME	0.1	save opt-in's documents that were recently received

Date	Staff	Amount of Time	Description
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	ME	0.5	MD/JLP/ME meeting to review timeline and process for scheduling plaintiff depositions
7/23/2015	ME	0.1	file answers to interrogatories and amended answers to interrogatories recently produced to defense counsel
7/23/2015	MD	2.5	md drafting motion to compel 2.5
7/23/2015	JP	0.5	MD/JLP/ME meeting to review timeline and process for scheduling plaintiff depositions
7/23/2015	ME	0.7	DG/MD/JLP/MR/ME litigation team meeting to discuss data needed for damage calculations .3; determine initial process for mediation .4
7/23/2015	AN	0.1	Telephone call to opt-in
7/23/2015	JP	0.2	JLP/ME discuss involvement in damage calculations for mediation
7/23/2015	AN	0.2	Telephone call to opt-in regarding questions
7/23/2015	JS	0.2	call re: CTS and retainer process
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	ME	0.1	draft amended answer to interrogatories for opt-in per opt-in's request
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	AN	0.2	Telephone call to opt-in regarding questions
7/23/2015	CLER	0.1	file documents received by opt-in
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	AN	0.2	Telephone call to opt-in re questions
7/23/2015	AN	0.1	Telephone call to opt-in re questions
7/23/2015	ME	0.4	AN/ME review background information about list of people to call regarding completing the questions for answers to interrogatories
7/23/2015	CLER	0.2	prepare FedEx label for opt-in
7/23/2015	AN	0.2	Telephone call to opt-in
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	ME	0.1	schedule meeting to discuss scheduling of opt-in depositions
7/23/2015	AN	0.2	Telephone call to claimant regarding questions
7/23/2015	AN	0.2	Compose email with link to questions to send to opt-in's new email address
7/23/2015	ME	0.1	review status of completed questions for answers to interrogatories
7/23/2015	ME	0.1	draft amended answer to interrogatories for opt-in per opt-in's request
7/23/2015	JP	0.2	JLP/AN Review phone calling task regarding completion of questions
7/23/2015	AN	0.2	JLP/AN Review phone calling task regarding completion of questions
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	ME	0.6	review plaintiffs' discovery demands to find demands related the the hours worked and pay of TSRs and PTMs
7/23/2015	AN	0.1	Telephone call to opt-in
7/23/2015	CLER	2.1	create PDF format of documents recd from client (organize and prepare)
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	AN	0.4	AN/ME review background information about list of people to call regarding completing the questions for answers to interrogatories
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	ME	0.1	save documents received from opt-in
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	AG	0.3	conduct pacer search of active FLSA cases against Defendants
7/23/2015	ME	0.2	telephone conversation with opt-in regarding sending documents to our office .1; notes from conversation .1
7/23/2015	JP	0.7	DG/MD/JLP/MR/ME litigation team meeting to discuss data needed for damage calculations .3; determine initial process for mediation .4

Date	Staff	Amount of Time	Description
7/23/2015	DG	0.7	DG/MD/JLP/MR/ME litigation team meeting to discuss data needed for damage calculations .3; determine initial process for mediation .4
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	MD	0.7	DG/MD/JLP/MR/ME litigation team meeting to discuss data needed for damage calculations .3; determine initial process for mediation .4
7/23/2015	MR	0.7	DG/MD/JLP/MR/ME litigation team meeting to discuss data needed for damage calculations .3; determine initial process for mediation .4
7/23/2015	AN	0.2	Telephone call regarding questions
7/23/2015	AN	0.1	Compose email with line to questions
7/23/2015	CLER	0.3	create PDF format of docket reports recd from PACER system to docket file of active FLSA cases against Defendants with current ECF filings
7/23/2015	MD	0.5	MD/JLP/ME meeting to review timeline and process for scheduling plaintiff depositions
7/23/2015	AN	0.1	Telephone call to opt-in regarding questions
7/23/2015	ME	0.1	draft amended answer to interrogatories for opt-in per opt-in's request
7/24/2015	ME	0.2	send FOIA request information to MD so that he can follow up about the status
7/24/2015	MD	1	md researching case law waiver for 30b6 testimony 1.0
7/24/2015	ME	0.2	telephone call with opt-in regarding questions for answers to interrogatories .1; notes from conversation .1
7/24/2015	MD	1.1	md drafting motion to compel 1.1
7/24/2015	ME	0.5	Perform DT search on documents produced by defense counsel to identify an individual to depose
7/24/2015	ME	0.1	MR/ME discuss DT search for discovery documents
7/24/2015	ME	0.1	save opt-in's documents
7/24/2015	ME	0.2	JLP/ME review issues with processing questions completed for answers to interrogatories .1; discuss opt-in who requested to withdraw from case
7/24/2015	ME	0.1	reply via email to opt-in regarding documents sent to our office and updated contact information
7/24/2015	MD	0.2	md/dg discussing call with KY counsel and discovery he received and arguments he'll make to defeat outside sales exemption 0.2
7/24/2015	CLER	2.1	create PDF format of documents recd from client
7/24/2015	ME	0.8	telephone call with opt-in to complete questions for answer to interrogatories .7; notes from conversation .1
7/24/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
7/24/2015	ME	0.1	email opt-in a link to questions for answers to interrogatories
7/24/2015	ME	0.2	telephone call with opt-in regarding sending documents to our office
7/24/2015	ME	0.1	update opt-in's contact information
7/24/2015	ME	0.8	review issues with opt-ins' questions for answers to interrogatories to determine next steps in processing them
7/24/2015	ME	0.1	update opt-in's contact information in database
7/24/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
7/24/2015	MD	0.3	md editing email to defense counsel about mediation 0.3
7/24/2015	DG	0.4	md/dg call with plaintiffs' counsel in case pending in KY who's brining FLSA OT claims 0.4
7/24/2015	ME	0.7	completed questions for answers to interrogatories with opt-in over the phone
7/24/2015	MD	0.1	md send email to plaintiffs' counsel about call for status of case 0.1
7/24/2015	MD	0.4	md/dg call with plaintiffs' counsel in case pending in KY who's brining FLSA OT claims 0.4
7/24/2015	DG	0.2	md/dg discussing call with KY counsel and discovery he received and arguments he'll make to defeat outside sales exemption 0.2

Date	Staff	Amount of Time	Description
7/24/2015	CLER	0.1	PCF client (never recd email of questions)
7/24/2015	MD	0.2	md/dg discussing settlement proposal process and email to defense counsel 0.2
7/24/2015	ME	0.1	scan fax sent by opt-in
7/24/2015	ME	0.1	save documents that were sent via email from opt-in
7/24/2015	ME	0.1	telephone call with claimant verifying receipt of fax
7/24/2015	ME	0.1	save opt-in's documents that were sent via email
7/24/2015	ME	0.7	search public information on the internet for more information about the 1999 department of labor investigation of Nabisco
7/24/2015	ME	0.1	send opt-in email with link to questions for answers to interrogatories
7/24/2015	MD	0.1	md respond to client about status of settlement 0.1
7/24/2015	DG	0.2	md/dg discussing settlement proposal process and email to defense counsel 0.2
7/24/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
7/24/2015	MD	0.1	md/dg call defense counsel about mediation 0.1
7/24/2015	MD	0.4	md/dg call with defense counsel about mediation 0.4
7/24/2015	MD	0.3	md call with US DOL about status of FOIA request 0.3
7/24/2015	MR	0.1	MR/ME discuss DT search for discovery documents
7/24/2015	DG	0.8	md/dg call with defense counsel about mediation 0.4; draft outline of terms for mediation agreement .3; review edits re same, emails to team re same .1
7/24/2015	DG	0.1	md/dg call defense counsel about mediation 0.1
7/27/2015	DG	0.2	md/dg discussing the impact of the litigation status in the KY and ME cases, how a negative SJ ruling will impact our case, and potentially staying the other cases 0.2
7/27/2015	AN	0.2	Telephone call from opt-in regarding questions
7/27/2015	AN	0.1	Telephone call to opt-in regarding questions
7/27/2015	JP	0.1	JLP/ME review issue with filing of opt-in's produced documents
7/27/2015	AN	0.1	Compose email to opt-in with link to online questions
7/27/2015	CLER	1.5	create PDF format of documents recd from client
7/27/2015	MD	0.2	md/dg discussing the impact of the litigation status in the KY and ME cases, how a negative SJ ruling will impact our case, and potentially staying the other cases 0.2
7/27/2015	MD	0.2	md/jp discussing review of email to send to clients re depositions and potential for mediation 0.2
7/27/2015	AN	0.1	Telephone call to opt-in regarding questions
7/27/2015	ME	0.1	save documents produced by defense counsel to server
7/27/2015	ME	0.1	save documents sent by opt-in
7/27/2015	AN	0.1	Telephone call to opt-in regarding questions
7/27/2015	AN	0.1	Telephone call to opt-in regarding questions
7/27/2015	JP	0.2	md/jp discussing review of email to send to clients re depositions and potential for mediation 0.2
7/27/2015	AN	0.1	Telephone call to opt-in about questions
7/27/2015	ME	0.1	save documents sent by opt-in
7/27/2015	MD	0.5	md/dg conference call with counsel in ME RSR case regarding proof of non-exemption and hours worked 0.5
7/27/2015	AN	0.1	Telephone call to opt-in regarding questions
7/27/2015	CLER	0.1	create PDF format of documents recd from D. ( D. responses and objections to P. 7th doc and ESI demand/D. responses and objections to P. 1st request to admit to D.)

Date	Staff	Amount of Time	Description
7/27/2015	DG	0.5	md/dg conference call with counsel in ME RSR case regarding proof of non-exemption and hours worked 0.5
7/27/2015	ME	0.1	download documents produced by defense counsel
7/27/2015	AN	0.2	Telephone call to opt-in regarding questions
7/27/2015	AN	0.1	Telephone call to opt-in regarding questions
7/27/2015	AN	0.2	Compose email with link to questions
7/27/2015	ME	0.1	reply to opt-in's email regarding sending documents responsive to interrogatories to our office
7/27/2015	ME	0.1	draft amended answer to interrogatories for opt-in per opt-in's request .1; save and track .1
7/27/2015	AN	0.1	Telephone call to claimant regarding questions
7/27/2015	ME	0.1	JLP/ME review issue with filing of opt-in's produced documents
7/27/2015	ME	0.1	reply to opt-in's email regarding questions about sending documents responsive to interrogatories to our office
7/27/2015	ME	0.2	reply to opt-in's email regarding case update
7/27/2015	AN	0.1	Telephone call to opt-in regarding questions
7/27/2015	CLER	1.1	create PDF format of documents recd from client
7/27/2015	ME	0.1	review status of recently completed questions responses for answers to interrogatories
7/28/2015	ME	0.1	email AN documents needed to mail questions for answers to interrogatories to opt-ins
7/28/2015	ME	0.2	file defendant's responses to 7th document request and first request to admit
7/28/2015	AN	0.2	Prepare cover letter to accompany questions by postal mail
7/28/2015	MD	0.5	md read Kellogg opposing brief for motion to compel 0.5
7/28/2015	AN	0.1	Telephone call to opt-in regarding questions
7/28/2015	AN	0.2	Prepare cover letter to accompany questions by postal mail
7/28/2015	AN	0.1	Compose email with link to online questions
7/28/2015	AN	0.2	Telephone call to opt-in regarding questions and contact information
7/28/2015	AN	0.2	Prepare cover letter to accompany questions by postal mail
7/28/2015	AN	0.1	Compose email with link to online questions
7/28/2015	AN	0.2	Telephone call to opt-in regarding online questions and contact information
7/28/2015	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy (Docket#314 - RESPONSE, by Defendants Kellogg Company, Kellogg Sales Company, to [311] MOTION to Compel Discovery. Oral Argument Requested. (Attachments: # (1) Exhibit Exhibit A, # (2) Exhibit Exhibit B, # (3) Exhibit Exhibit C, # (4) Exhibit Exhibit D, # (5) Exhibit Exhibit E, # (6) Exhibit Exhibit F, # (7) Exhibit Exhibit G, # (8) Exhibit Exhibit H, # (9) Exhibit Exhibit H, # (10) Exhibit Exhibit I)(Nelson, James)
7/28/2015	AN	0.1	Compose email with link to online questions
7/28/2015	AN	0.2	Telephone call to opt-in regarding online questions and contact information
7/28/2015	AN	0.1	Compose email with link to online questions
7/28/2015	CLER	2	create PDF format of documents recd from client
7/28/2015	ME	0.1	verify that opt-in has not yet completed questions for answer to interrogatories
7/28/2015	CLER	1.5	create PDF format of documents recd from client
7/28/2015	AN	0.2	Telephone call from opt-in regarding contact information and online questions
7/28/2015	MD	0.5	md call with client about documents produced by Kellogg 0.5
7/28/2015	AN	0.2	Telephone call from opt-in regarding online questions and contact information
7/28/2015	AN	0.2	Telephone call to opt-in regarding questions



Date	Staff	Amount of Time	Description
7/29/2015	AN	0.2	Telephone call to opt-in to update client contact information for access to questions
7/29/2015	ME	0.2	save newest questions results to be used for answers to interrogatories
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	CLER	0.3	create PDF format of documents recd from client
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	ME	0.1	listen to voicemail from opt-in
7/29/2015	AN	0.2	organize case folder of mailed questions documents
7/29/2015	ME	1	review discovery documents received by defense counsel
7/29/2015	AN	0.1	AN/ME review case organization
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	ME	0.1	AN/ME review case organization
7/29/2015	ME	0.1	return call to department of labor regarding FOIA request
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.2	Compose email with link to questions to send to new email address.
7/29/2015	JP	0.3	JP/MD/DG/ME litigation team meeting to discuss filing of new complaint .1; issues with discovery .1; and compiling list of people to depose
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Compose email to opt-in with link to online questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.2	Telephone call from opt-in regarding questions and contact information
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	MD	0.3	JP/MD/DG/ME litigation team meeting to discuss filing of new complaint .1; issues with discovery .1; and compiling list of people to depose
7/29/2015	DG	0.3	JP/MD/DG/ME litigation team meeting to discuss filing of new complaint .1; issues with discovery .1; and compiling list of people to depose
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.2	Telephone call from opt-in regarding new contact information, case update and online questions link
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions and contact information
7/29/2015	AN	0.2	Telephone call from opt-in to discuss case and update contact information
7/29/2015	CLER	2.1	create PDF format of documents recd from client
7/29/2015	AN	0.1	Compose email to opt-in with link to online questions
7/29/2015	AN	0.2	Telephone call to opt-in regarding questions and contact information
7/29/2015	ME	0.3	JP/MD/DG/ME litigation team meeting to discuss filing of new complaint .1; issues with discovery .1; and compiling list of people to depose
7/29/2015	AN	0.1	Compose email to opt-in's new email address with link to questions
7/29/2015	MD	2	md drafting motion to compel outline and conducting caselaw research 2.0
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	ME	0.1	respond to opt-ins email regarding requesting amended answer to interrogatories
7/29/2015	CLER	1.2	create PDF format of documents recd from client
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions

Date	Staff	Amount of Time	Description
7/29/2015	AN	0.1	Compose email with link to online questions for opt-in
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	ME	0.1	save opt-in's documents that are responsive to interrogatories
7/29/2015	AN	0.2	Prepare written questions to mail to opt-in via post office
7/29/2015	AN	0.2	Telephone call from opt-in regarding contact information and questions
7/29/2015	ME	0.1	left voicemail regarding FOIA request
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.1	Telephone call to opt-in regarding questions
7/29/2015	AN	0.2	Telephone call to opt-in regarding questions and contact information
7/29/2015	AN	0.1	Compose email to opt-in with link to online questions
7/30/2015	ME	0.1	telephone conversation with opt-in regarding questions for answer to interrogatories
7/30/2015	AN	0.1	Telephone call to opt-in regarding questions
7/30/2015	ME	0.2	telephone call with opt-in regarding question about questions .1; notes from conversation .1
7/30/2015	AN	0.1	Compose email to opt-in with link to online questions
7/30/2015	AN	0.2	Telephone call to opt-in regarding questions
7/30/2015	ME	0.1	verify if opt-in has completed questions for initial disclosure
7/30/2015	AN	0.2	Prepare letter to mail with questions to opt-in
7/30/2015	JP	0.2	md/jp discussing following up about witness re overtime pay for TM who drives a truck
7/30/2015	AN	0.1	Telephone call to opt-in regarding online questions
7/30/2015	MD	0.2	md/jp discussing following up about witness re overtime pay for TM who drives a truck
7/30/2015	AN	0.2	Prepare letter to send with questions by postal mail to opt-in
7/30/2015	AN	0.2	Telephone call to opt-in regarding questions
7/30/2015	AN	0.1	Telephone call to opt-in regarding questions
7/30/2015	AN	0.1	Compose email with link to online questions
7/30/2015	MD	0.3	md/mr discussing need for KSTARS data 0.3
7/30/2015	AN	0.1	Compose email with link to online questions
7/30/2015	ME	0.1	ME/AN Review tracking of changes to email addresses and other contact information for opt-ins
7/30/2015	CLER	1.9	create PDF format of documents recd from client
7/30/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#315 - Stipulated MOTION to Extend Deadlines Regarding Plaintiffs Motion to Compel Discovery and [Proposed] Order by Plaintiff Patty Thomas
7/30/2015	AN	0.1	ME/AN Review tracking of changes to email addresses and other contact information for opt-ins
7/30/2015	AN	0.1	Telephone call to opt-in regarding online questions
7/30/2015	JP	0.1	JLP/AN Review consequences if opt-ins are not reachable when case settles
7/30/2015	AN	0.2	Prepare letter to send by postal mail with copy of questions to opt-in
7/30/2015	AN	0.2	Telephone call to opt-in regarding questions
7/30/2015	AN	0.1	Telephone call to opt-in regarding questions
7/30/2015	AN	0.2	Prepare letter to mail with written copy of questions to opt-in
7/30/2015	MR	0.3	md/mr discussing need for KSTARS data 0.3
7/30/2015	AN	0.2	Prepare letter to send with written questions to opt-in by postal mail
7/30/2015	AG	0.1	ECF Filing of Stipulated MOTION to Extend Deadlines Regarding Plaintiffs Motion to Compel Discovery and [Proposed] Order
7/30/2015	AN	0.1	JLP/AN Review consequences if opt-ins are not reachable when case settles

Date	Staff	Amount of Time	Description
7/30/2015	MD	0.2	md/jp discussing need for KSTARs data 0.2
7/30/2015	JP	0.2	md/jp discussing need for KSTARs data 0.2
7/30/2015	AN	0.2	Prepare letter to send by postal mail with copy of questions to opt-in
7/30/2015	AN	0.1	Telephone call to opt-in regarding online questions
7/30/2015	AN	0.1	Compose email to opt-in with link to online questions
7/30/2015	AN	0.1	Telephone call to opt-in regarding online questions
7/30/2015	AN	0.2	Telephone call to opt-in to discuss questions and contact information
7/30/2015	AN	0.2	Telephone call from opt-in regarding questions
7/30/2015	MD	0.3	md review variable labor reports 0.3
7/30/2015	AN	0.2	Telephone call from opt-in discussing questions
7/30/2015	CLER	0.1	create PDF format of documents recd from client
7/30/2015	AN	0.1	Compose email to opt-in with link to online questions
7/30/2015	MD	2.5	md drafting reply brief for motion to compel 2.5
7/30/2015	MD	0.3	md draft stipulation re extension for motion to compel, send to defense counsel, and send to court 0.3
7/30/2015	AN	0.1	Telephone call to opt-in regarding questions
7/30/2015	ME	0.2	file opt-in's documents that were sent via email .1; track receipt of documents .1
7/30/2015	AN	0.1	Compose email to opt-in with link to online questions
7/30/2015	AN	0.2	Telephone call to opt-in regarding online questions
7/30/2015	CLER	0.3	create PDF format of documents recd from client
7/30/2015	MR	2.7	ready latest results from question 3 (31 replies) for Answers to Rogs after paras inspect results 2.7
7/30/2015	AN	0.2	Prepare letter to send by postal mail with copy of questions to opt-in
7/30/2015	AN	0.1	Compose email to opt-in with link to online questions
7/30/2015	AN	0.1	Telephone call to opt-in regarding questions
7/30/2015	ME	0.5	review documents produced by defense counsel for facts to support case
7/30/2015	MR	0.5	make formatting and other revisions to new completed questions response sheet .4, email to paras ME and JP regarding same .1
7/30/2015	AN	0.4	Update spreadsheet tracking contact with opt-ins who have not yet completed questions
7/31/2015	CLER	0.2	prepare FedEx mailing to client (return of [client] documents as requested)
7/31/2015	ME	0.1	file opt-in documents that were produced to defense counsel
7/31/2015	ME	0.1	update tracking sheet to record opt-in documents that were produced to defense counsel
7/31/2015	AN	0.1	Telephone call to opt-in regarding questions
7/31/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
7/31/2015	ME	0.1	prepare opt-in's documents for production to defense counsel
7/31/2015	AN	0.1	Telephone call to opt-in regarding questions
7/31/2015	ME	0.1	prepare opt-in's documents for production to defense counsel
7/31/2015	AN	0.2	Prepare cover letter to mail with paper copy of questions to opt-in
7/31/2015	AN	0.2	Telephone call with opt-in to discuss link to online questions
7/31/2015	AN	0.1	Compose email with link to online questions to send to opt-in
7/31/2015	AN	0.2	Prepare cover letter to mail with paper copy of questions to opt-in
7/31/2015	MD	0.5	md read summary judgment motion in Kellogg KY case 0.5
7/31/2015	ME	0.1	prepare opt-in's document for production to defense counsel
7/31/2015	AN	0.2	Telephone call to opt-in to discuss link to online questions
7/31/2015	AN	0.1	Telephone call regarding questions
7/31/2015	AN	0.2	Prepare letter to accompany written copy of questions to send by postal mail
7/31/2015	AN	0.2	Prepare cover letter to mail with paper copy of questions to opt-in

Date	Staff	Amount of Time	Description
7/31/2015	AN	0.2	Telephone call to opt-in regarding questions
7/31/2015	ME	0.2	prepare opt-in documents to be produced to defense counsel today
7/31/2015	ME	0.2	prepare opt-in's documents for production to defense counsel
7/31/2015	ME	0.1	file opt-in's documents on server
7/31/2015	ME	0.1	prepare opt-in's document for production to defense counsel
7/31/2015	CLER	1	create PDF format of documents recd from client
7/31/2015	AN	0.1	Telephone call to opt-in to discuss link to online questions
7/31/2015	AN	0.2	Prepare cover letter to mail with paper copy of questions to opt-in
7/31/2015	AN	0.1	Telephone call to opt-in to discuss link to online questions
7/31/2015	ME	0.1	prepare opt-in's documents for production to defense counsel
7/31/2015	CLER	0.1	file documents produced by defense counsel
7/31/2015	MD	0.1	md call with defense counsel about mediation/scheduling deposition 0.1
7/31/2015	AN	0.1	Telephone call to opt-in regarding questions
7/31/2015	AN	0.1	Telephone call to opt-in regarding questions
7/31/2015	ME	0.1	prepare opt-in's documents for production to defense counsel
7/31/2015	AN	0.2	Prepare cover letter to mail with written copy of questions to opt-in at his request
7/31/2015	AN	0.2	Prepare letter to accompany written copy of questions to be mailed to opt-in
7/31/2015	ME	0.1	produce opt-in documents to defense counsel
7/31/2015	AN	0.2	Telephone call to opt-in to discuss link to online questions
7/31/2015	AN	0.5	Update spreadsheet tracking contact attempts re questions
7/31/2015	AG	0	prepare ltr to client (return of [client] documents)
7/31/2015	AN	0.2	Prepare cover letter to mail with paper copy of questions to opt-in
7/31/2015	ME	0.1	download documents produced by defense counsel
7/31/2015	ME	0.1	file opt-in's documents on server
7/31/2015	ME	0.1	prepare opt-in's documents for production to defense counsel
7/31/2015	AN	0.1	Telephone call to opt-in to discuss link to online questions
7/31/2015			Transfer documents recd from ECF system to docket file and create file copy (Docket#319 - ORDER on STIPULATION re [315] Stipulated MOTION to Extend Deadlines Regarding Plaintiffs Motion to Compel Discovery and [Proposed] Order filed by Patty Thomas; Noting Date 8/7/2015; signed by Judge Ronald B. Leighton. (DN)
7/31/2015	CLER	0.1	
7/31/2015	AN	0.1	Telephone call to opt-in regarding questions
7/31/2015	AN	0.1	Telephone call from opt-in to discuss questions and contact information
7/31/2015	AN	0.2	Prepare cover letter to mail with paper copy of questions to opt-in
7/31/2015	AN	0.1	Telephone call to opt-in regarding questions
7/31/2015	ME	0.2	review status of opt-ins' answers to interrogatories and produced documents
7/31/2015	AN	0.2	Prepare cover letter to send with paper copy of questions to opt-in
7/31/2015	AN	0.1	Telephone call to opt-in regarding questions
8/3/2015	CLER	0.1	create PDF format of document recd from client (TM/RSR questions)
8/3/2015			Transfer documents recd from PACER system to docket file and create file copy (Docket#49-1 Memorandum in Support Memorandum of MOTION in Limine McCartt v. Kellogg USA, Inc. et al Eastern District of Kentucky 5:2014-cv-00318)
8/3/2015	CLER	0.1	
8/3/2015			Transfer documents recd from PACER system to docket file and create file copy (Docket#48-1 Memorandum in Support Memorandum of MOTION for Summary Judgment - McCartt v. Kellogg USA, Inc. et al Eastern District of Kentucky 5:2014-cv-00318)
8/3/2015	CLER	0.1	
8/3/2015	ME	0.2	draft answer to interrogatories for opt-in who completed handwritten questions
8/3/2015	ME	0.1	email to opt-in with link to questions for answer to interrogatories

Date	Staff	Amount of Time	Description
8/3/2015	ME	0.1	telephone with opt-in regarding completing questions for answer to interrogatories
8/4/2015	DG	0.1	email to James Boudreau re mediation and stay .1
8/4/2015	AN	0.2	Prepare letter to send with paper copy of questions by postal mail
8/4/2015	ME	0.9	read summary judgment from similar Kellogg case
8/4/2015	AN	0.2	Update questions tracking spreadsheet with new data
8/4/2015	AN	0.2	Prepare cover letter to send with paper copy of questions to opt-in
8/4/2015	AN	0.1	Telephone call from opt-in regarding questions
8/5/2015	AN	0.1	ME/AN Review tracking of opt-ins without active email addresses
8/5/2015	ME	0.1	reply to email from opt-in regarding documents responsive to interrogatories
8/5/2015	ME	0.1	ME/AN Review tracking of opt-ins without active email addresses
8/5/2015	ME	0.1	reply to email from opt-in regarding documents responsive to interrogatories
8/5/2015	ME	0.4	review opt-in's documents sent in response to interrogatories
8/5/2015	CLER	0.4	create PDF format of document recd from client
8/5/2015	AN	0.1	AN/ME review meaning of notes from recent contact with clients
8/5/2015	DG	0.2	review James Boudreau's email re mediation status .0, and prepare response .2
8/5/2015	ME	0.1	AN/ME review meaning of notes from recent contact with clients
8/5/2015	ME	0.1	file opt-in's scanned documents
8/5/2015	ME	0.1	reply to opt-in's email regarding updated mailing address
8/5/2015	ME	0.1	update opt-in's mailing address in client database
8/5/2015	ME	0.1	ME/AN Review opt-in's questions responses that were handwritten on mailed copy
8/5/2015	AN	0.1	ME/AN Review opt-in's questions responses that were handwritten on mailed copy
8/5/2015	ME	0.9	update answer to rogs tracking spreadsheet to include updated client contact information
8/6/2015	ME	0.1	listen to voicemail from opt-in regarding sending documents to our office
8/6/2015	ME	0.2	telephone call with opt-in regarding case update
8/6/2015	DG	0.1	DG/ME discuss FOIA request re Nabisco case
8/6/2015	ME	0.1	DG/ME discuss FOIA request re Nabisco case
8/6/2015	ME	0.4	JLP/ME discuss explaining purpose of lawsuit to opt-in .2; discuss procedure for gathering information from opt-ins .2
8/6/2015	ME	0.1	email shipping label to opt-in to use to send documents to our office
8/6/2015	ME	0.1	left voicemail for opt-in regarding shipping label
8/6/2015	ME	0.1	prepare shipping label for opt-in to use to send documents to our office
8/6/2015	ME	0.1	email JLP regarding reviewing plaintiff rogs
8/6/2015	DG	3	edit reply brief 2; legal research re reply brief 1
8/6/2015	CLER	0.1	create PDF format of document recd from client (TM/RSR questions)
8/6/2015	ME	0.3	review documents recently received from opt-ins
8/7/2015	ME	0.4	review motion to compel response .3; make edits .1
8/7/2015	ME	0.5	prepare opt-in's documents for production to defense counsel
8/7/2015	ME	0.1	telephone call with claimant regarding case update
8/7/2015	ME	0.3	break out opt-in's documents into categories of docs for more effective filing
8/7/2015	ME	0.2	prepare opt-in's documents for production to defense counsel
8/7/2015	CLER	0.1	file hard copies of opt-in's documents
8/7/2015	ME	0.1	listen to voicemail from opt-in
8/7/2015	ME	0.3	read information regarding related cases
8/7/2015	ME	0.4	review opt-ins' questions responses
8/7/2015	AG	0.1	ECF Filing of Plaintiffs' Reply to Plaintiffs' Motion to Compel Discovery

Date	Staff	Amount of Time	Description
8/7/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#317 - Plaintiffs' Reply to Plaintiffs' Motion to Compel Discovery (REPLY, filed by Plaintiff Patty Thomas, TO RESPONSE to [311] MOTION to Compel Discovery (Getman, Dan)
8/7/2015	DG	1.8	draft reply brief 1.4; legal research re same re regs .4
8/7/2015	ME	0.3	draft answer to interrogatories for opt-in based on opt-in's questions responses
8/7/2015	CLER	0.1	file hard copy of client's note to us regarding docs
8/7/2015	CLER	0.1	file hard copies of opt-in's documents
8/7/2015	ME	0.5	review documents produced by defense counsel
8/7/2015	ME	0.1	break out opt-in's scanned documents into categories of docs
8/7/2015	ME	0.1	left vm for opt-in regarding clarifying questions answers for rogs
8/7/2015	ME	0.1	track completed questions for rogs in client tracking sheet
8/7/2015	ME	0.1	review recently received opt-in documents to determine work needed to produce to defense counsel
8/7/2015	CLER	0.1	file hard copies of opt-in's documents
8/7/2015	ME	0.2	review opt-in's questions responses to prepare to ask opt-in for clarification
8/7/2015	CLER	0.1	file hard copies of opt-in's documents
8/7/2015	CLER	0.1	file hard copies of opt-in's documents
8/10/2015	CLER	0.1	create PDF format of document recd from client (TM/RSR questions)
8/10/2015	CLER	0.2	create PDF format of documents recd from client
8/10/2015	ME	0.5	telephone conversation with opt-in regarding questions about completing questions for answers to interrogatories
8/10/2015	ME	0.1	verify production of opt-in's answers to interrogatories
8/11/2015	ME	0.1	leave voicemail for opt-in regarding confirming spelling of name
8/11/2015	CLER	0.1	PCF client (update contact information)
8/11/2015	ME	0.1	track documents received by opt-in
8/11/2015	ME	0.1	track questions responses received by opt-in
8/11/2015	ME	0.5	draft interrogatory response for opt-in based on opt-in's response to questions
8/11/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
8/11/2015	AN	0.2	Respond to email from opt-in (0.1) and update database with new information (0.1)
8/11/2015	ME	0.3	break out opt-in's documents into categories to prepare documents for production to defense counsel
8/11/2015	ME	0.7	telephone conversation with opt-in to discuss opt-in's documents .6; notes from conversation .1
8/11/2015	ME	0.3	Bates stamp opt-in's documents to prepare documents for production to defense counsel
8/11/2015	ME	0.1	verify opt-in's questions responses regarding whether or not opt-in has any documents
8/11/2015	ME	0.5	break opt-in's documents into categories to prepare documents for production to defense counsel
8/12/2015	MR	1.6	prep for ESI deposition: create outline 1.0, review exhibits .3, review prior depositions .3
8/12/2015	AG	0.5	arrange court reporter for deposition
8/12/2015	ME	0.4	review emails for information regarding deposition
8/12/2015	ME	0.2	MR/ME provide brief overview of 30(b)(6) ESI deposition
8/12/2015	JP	1	JP/MR review and edit questionnaire questions for rog answers
8/12/2015	ME	0.1	send email to JP regarding ESI deposition



Date	Staff	Amount of Time	Description
8/12/2015	DG	3.3	phone calls to schedule/reschedule 30b6 IT deposition 1; DG/MR participate in continuation ESI 30b6 deposition of James Dombkiewicz
8/12/2015	MR	0.2	DG/JP/MR phone discussion regarding ESI depo
8/12/2015	DG	0.2	DG/JP/MR phone discussion regarding ESI depo
8/12/2015	JP	0.2	DG/JP/MR phone discussion regarding ESI depo
8/12/2015	ME	0.5	prepare exhibits for 30(b)(6) ESI deposition
8/12/2015	ME	0.1	JP/ME discuss status of ESI deposition
8/12/2015	MR	0.2	MR/ME provide brief overview of 30(b)(6) ESI deposition
8/12/2015	ME	0.2	locate Bates numbers of exhibit to be used in 30(b)(6) ESI deposition
8/12/2015	JP	0.1	JP/ME discuss status of ESI deposition
8/12/2015	MR	1	JP/MR review and edit questionnaire questions for rog answers
8/12/2015	ME	0.2	send ESI deposition exhibits to defense counsel
8/12/2015	AN	0.2	Telephone call from opt-in regarding case update and new telephone number
8/12/2015	MR	0.1	JP/MR/ME discuss exhibits for ESI deposition to send to defense counsel
8/12/2015	JP	0.1	JP/MR/ME discuss exhibits for ESI deposition to send to defense counsel
8/12/2015	MR	2.3	DG/MR participate in continuation ESI 30b6 deposition of James Dombkiewicz
8/12/2015	ME	0.1	JP/MR/ME discuss exhibits for ESI deposition to send to defense counsel
8/13/2015	MR	0.6	compare various pdf paystubs with excel payroll with regard to excel payroll issues
8/13/2015	MR	0.5	combine new Kellogg payroll sheets into combined sheet .3, briefly examine data .2
8/13/2015	MR	0.4	compose email to team detailing issues with excel payroll data
8/13/2015	MR	0.2	continued examination of 1st section of new payroll data .2
8/13/2015	CLER	0.1	File client document in file cabinet
8/14/2015	ME	0.2	prepare opt-in's documents for production to defense counsel
8/14/2015	ME	0.3	JP/ME review opt-in's concerns about completing answers to interrogatories
8/14/2015	ME	0.1	file opt-in's electronic documents
8/14/2015	CLER	0.2	create PDF format of documents recd from client (discovery documents)
8/16/2015	MR	0	payroll data work
8/17/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
8/17/2015	MD	0.2	md/dg discussing 30b6 ESI deposition and mediation status 0.2
8/17/2015	DG	0.2	md/dg discussing 30b6 ESI deposition and mediation status 0.2
8/17/2015	CLER	0.1	create PDF format of documents recd from client (TM/RSR questions)
8/17/2015	MD	0.1	md review email from defense counsel about mediation 0.1
8/18/2015	ME	0.5	determine total number of depositions that have been taken of both plaintiffs and defendants
8/18/2015	CLER	0.1	create PDF format of documents recd from client
8/18/2015	CLER	0.3	review and organize documents
8/18/2015	MD	0.6	md speaking with attorney in KY about outside sales exemption 0.6
8/18/2015	MD	1	md drafting stipulation for stay 1.0
8/18/2015	DG	0.4	edit mediation stipulation.4
8/19/2015	CLER	0.6	download and file documents produced by defense counsel
8/19/2015	ME	0.1	JP/ME discuss tasks needed to complete during mediation period
8/19/2015	JP	0.1	JP/ME discuss tasks needed to complete during mediation period
8/20/2015	ME	0.2	try to determine which opt-in faxed a document with initials but no name
8/20/2015	ME	0.5	review statement of facts from similar case involving direct store delivery
8/21/2015	MD	0.1	MD/ME discuss information to be redacted from opt-in's document
8/21/2015	ME	0.1	send opt-in's documents responsive to interrogatories to defense counsel
8/21/2015	MD	0.1	MD/ME discuss next step regarding newly received consent to sue
8/21/2015	ME	0.1	prepare opt-in's documents for production to defense counsel

Date	Staff	Amount of Time	Description
8/21/2015	ME	0.1	MD/ME discuss next step regarding newly received consent to sue
8/21/2015	ME	0.1	MR/ME discuss steps needed before sending rog responses to opt-in's for review
8/21/2015	ME	0.2	download/save attachments to defendant's motion to compel discovery
8/21/2015	MR	0.1	MR/ME discuss steps needed before sending rog responses to opt-in's for review
8/21/2015	MD	0.1	MD/ME discuss following up with plts regarding amended answers to interrogatories
8/21/2015	ME	0.2	prepare shipping label to send to opt-in to use to ship documents to our office
8/21/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
8/21/2015	ME	0.1	telephone call with opt-in regarding case update
8/21/2015	ME	0.4	compile list of amended answers to interrogatories for MD to review
8/21/2015	ME	0.1	MD/ME discuss following up with plts regarding amended answers to interrogatories
8/21/2015	ME	0.2	prepare shipping label for opt-in to use to send documents to our office
8/21/2015	ME	0.5	review opt-in's documents
8/21/2015	ME	0.2	prepare shipping label for opt-in to use to send documents to our office
8/21/2015	ME	0.1	download and file defendant's motion to compel discovery responses and dismiss unresponsive plaintiffs
8/21/2015	ME	0.1	email to MR regarding preparing answers to interrogatories
8/21/2015	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
8/21/2015	ME	0.2	check newly opt-in questions that are to be used to draft answers to interrogatories to be sure none have already been completed
8/21/2015	ME	0.1	telephone conversation with opt-in regarding case update
8/21/2015	ME	0.1	file opt-in's documents on server
8/21/2015	ME	0.1	MD/ME discuss information to be redacted from opt-in's document
8/24/2015	ME	0.1	attempt to return opt-in's call
8/24/2015	ME	0.1	telephone call with opt-in regarding case update
8/24/2015	ME	0.1	scan opt-in's handwritten questions responses for answers to interrogatories
8/24/2015	ME	0.1	listen to voicemail from opt-in
8/24/2015	ME	0.1	reply to opt-in's email regarding verification of receipt of questions responses
8/24/2015	ME	0.1	reply to opt-in's email regarding sending documents to our office
8/24/2015	ME	0.3	draft amended answers to interrogatories based on opt-in's questions responses
8/24/2015	ME	0.1	listen to voicemail from opt-in
8/24/2015	ME	0.1	left voicemail for client/intake who left phone number to return call but no name
8/24/2015	ME	0.3	save emails that were sent to opt-ins to review the answers to interrogatories
8/25/2015	ME	0.1	email to opt-in regarding verification of receipt of questions responses
8/25/2015	ME	0.1	email to AN regarding responding to opt-in's inquiry
8/25/2015	AN	0.1	Update client information based on voicemail.
8/25/2015	JP	0.4	JP/ME meeting to discuss case organization
8/25/2015	MD	0.3	md call with defense counsel about mediation 0.3
8/25/2015	ME	0.4	JP/ME meeting to discuss case organization
8/25/2015	MD	0.2	MD/JLP/ME meeting to discuss case needs during mediation
8/25/2015	JP	0.2	MD/JLP/ME meeting to discuss case needs during mediation
8/25/2015	MD	0.5	md draft email to defense counsel and edit stipulation for stay 0.5
8/25/2015	ME	0.2	MD/JLP/ME meeting to discuss case needs during mediation
8/26/2015	ME	0.1	attempt to return call to opt-in who left name but not number
8/26/2015	MA	0.1	MA/AN/ME review process of filing documents with court

Date	Staff	Amount of Time	Description
8/26/2015	AN	0.1	MA/AN/ME review process of filing documents with court
8/26/2015	MD	0.2	MD/ME file motion for stay of case for purposes of mediation
8/26/2015	ME	0.1	MA/AN/ME review process of filing documents with court
8/26/2015	ME	0.1	update tracking spreadsheet to include information about documents recently produced to defense counsel
8/26/2015	ME	0.1	listen to voicemail from opt-in
8/26/2015	ME	0.2	MD/ME file motion for stay of case for purposes of mediation
8/27/2015	MD	4	md digesting depositions 4.0
8/28/2015	MD	4	md digesting deposition 4.0
8/28/2015	JS	0.3	upload new content/media, .2; post website update, .1
8/31/2015	CLER	0.1	create PDF format of document recd from D. ( D. responses and objections to P. 8th document and ESI demand)
8/31/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#320 - ORDER granting [319] Motion to Stay in order to conduct Mediation for Settlement purposes; Joint Status Report due by 11/6/2015; signed by Judge Ronald B. Leighton.(DN)
8/31/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#319 - Joint MOTION to Stay re [318] MOTION for Discovery to Compel Responses and for the purposes of mediation by Plaintiff Patty Thomas. Noting Date 9/4/2015, (Getman, Dan)
8/31/2015	JS	0.2	plt returning JP call
8/31/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#318 - MOTION for Discovery to Compel Responses by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Exhibit, # (2) Exhibit, # (3) Proposed Order) Noting Date 9/4/2015, (Nelson, James)
8/31/2015	JS	0.2	call re: docs
9/1/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#53 - RESPONSE in Opposition re 48 MOTION for Summary Judgment by Kellogg Sales Company, Kellogg USA, Inc. filed by James B. McCartt - (McCartt v. Kellogg USA, Inc. et al Eastern District of Kentucky 5:2014-cv-00318)
9/1/2015	CLER	0.2	Transfer documents recd from email system to docket file and create file copy FINAL ASCII from the 8-12-2015 deposition of Mr. Dombkiewicz. readable compressed PDF version with a word index, as well as a full-sized PDF and an E-Transcript version of the transcript.
9/1/2015	MD	0.3	md call with late consent to sue opt-in and explain status of case 0.3
9/1/2015	MD	0.3	md read summary judgment opposition in KY Kellogg case 0.3
9/1/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
9/1/2015	ME	0.1	send newly received CTS to MD so that he can contact client
9/3/2015	ME	0.1	reply to opt-in's email regarding sent document
9/3/2015	ME	0.1	save opt-in's document to server
9/3/2015	ME	0.1	save opt-in's documents on server
9/3/2015	ME	0.1	reply to opt-in from email regarding sent documents
9/3/2015	ME	0.1	forward email regarding withdrawing from the case to JP
9/4/2015	AN	0.2	Telephone call from claimant for case update
9/4/2015	JP	0.2	JP/ME review process for sending updates to clients via email
9/4/2015	ME	0.2	JP/ME review process for sending updates to clients via email
9/4/2015	ME	0.1	updated opt-in's mailing address in database
9/8/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
9/8/2015	ME	0.1	email opt-in case update

Date	Staff	Amount of Time	Description
9/8/2015	ME	0.2	compile list of opt-in's who need to review their amended answer to interrogatories
9/8/2015	AN	0.2	AN/ME discuss opt-in's concerns about not receiving emails from our office
9/8/2015	ME	0.6	review opt-in's documents to separate those that should be produced to defense counsel
9/8/2015	ME	0.4	draft answer to interrogatories for opt-in based on opt-in's handwritten questions responses
9/8/2015	ME	1.2	review opt-in's documents to determine which documents should be produced to defense counsel
9/8/2015	ME	0.2	create list of tasks to be completed
9/8/2015	ME	0.2	AN/ME discuss opt-in's concerns about not receiving emails from our office
9/8/2015	ME	0.2	ensure that rog tracking spreadsheet is up to date
9/8/2015	ME	0.2	file emails regarding McCartt case
9/8/2015	ME	0.2	review status of rog responses
9/8/2015	ME	0.1	email JP regarding location of email update to clients
9/9/2015	ME	0.1	draft amended answer to interrogatories for opt-in to review
9/9/2015	ME	0.5	DG/JP/MR/MD(in part)/ME team meeting to discuss tasks and data needed to prepare for mediation
9/9/2015	DG	0.5	DG/JP/MR/MD(in part)/ME team meeting to discuss tasks and data needed to prepare for mediation
9/9/2015	JP	0.5	DG/JP/MR/MD(in part)/ME team meeting to discuss tasks and data needed to prepare for mediation
9/9/2015	ME	0.2	review status of opt-ins who have not responded to questions for answers to interrogatories
9/9/2015	MR	0.5	DG/JP/MR/MD(in part)/ME team meeting to discuss tasks and data needed to prepare for mediation
9/9/2015	MD	0.4	DG/JP/MR/MD(in part)/ME team meeting to discuss tasks and data needed to prepare for mediation
9/9/2015	ME	0.3	JP/ME meeting to review improvements for case organization
9/9/2015	JP	0.3	JP/ME meeting to review improvements for case organization
9/9/2015	ME	0.1	draft amended answer to interrogatories for opt-in to review
9/9/2015	ME	0.1	draft amended answer to interrogatories for opt-in to review
9/9/2015	ME	0.3	review status of opt-ins who have completed questions for answer to interrogatories in order to update tracking spreadsheet
9/9/2015	ME	1.2	review case folders regarding class interrogatory responses for better organization
9/9/2015	ME	0.1	draft amended answer to interrogatories for opt-in to review
9/9/2015	ME	0.1	draft amended answer to interrogatories for opt-in to review
9/10/2015	ME	0.7	prepare opt-in's documents for production to defense counsel
9/10/2015	ME	0.8	prepare opt-in's documents for production to defense counsel
9/10/2015	ME	0.5	review opt-in's documents to prepare for production to defense counsel
9/10/2015	JP	1.8	JP/ME organized case folder
9/10/2015	ME	1.8	JP/ME organized case folder
9/10/2015	ME	0.2	telephone call with opt-in regarding questions for rogs .1; notes from conversation .1
9/10/2015	ME	0.1	update opt-in contact information in database
9/10/2015	ME	0.1	email opt-in case update
9/10/2015	ME	0.1	email opt-in link to questions for rogs
9/10/2015	ME	0.2	email opt-in regarding documents needed that are responsive to interrogatories

Date	Staff	Amount of Time	Description
9/10/2015	ME	0.6	o[client]ainze case folder containing documents for answers to interrogatories
9/10/2015	CLER	0.2	prepare mailing to client (return of o[client]. documents)
9/10/2015	ME	0.1	email opt-in regarding reviewing answer to interrogatories
9/11/2015	CLER	0.1	create PDF format of documents recd from client (TM/RSR answer to rogs)
9/11/2015	ME	0.5	compile list of dates production was sent to defense counsel
9/11/2015	ME	0.1	prepare opt-in's document for production to defense counsel
9/11/2015	JP	0.1	JLP/AN Review use of AIM/AOL program to send text message to opt-in re questions
9/11/2015	CLER	0.3	organize documents produced to defense counsel
9/11/2015	ME	0.1	review opt-in's documents
9/11/2015	ME	0.4	prepare opt-in's documents for production to defense counsel
9/11/2015	AN	0.1	JLP/AN Review use of AIM/AOL program to send text message to opt-in re questions
9/11/2015	ME	0.3	draft answer to interrogatory for opt-in based on opt-in's questions responses
9/11/2015	ME	0.3	organize files on server related to answers to interrogatories
9/14/2015	ME	0.2	draft answer to interrogatories for opt-in based on questions responses
9/14/2015	CLER	0.1	create PDF format of document recd from client (TM/RSR answer to rogs)
9/14/2015	ME	0.1	email opt-in regarding tracking number for documents
9/14/2015	JP	0.3	Discussed mediation update .1; em client docs needed for mediation .2
9/15/2015	ME	0.1	draft amended answer to interrogatories for opt-in
9/15/2015	MD	0.1	MD/ME discuss filing newly received consents to sue
9/15/2015	ME	0.1	MD/ME discuss filing newly received consents to sue
9/15/2015	ME	0.1	left voicemail for opt-in regarding clarifying questions responses for rog
9/15/2015	CLER	0.1	Data Entry of contact information
9/15/2015	CLER	0.1	create PDF format of CTS recd
9/15/2015	ME	0.2	telephone call with opt-in regarding clarifying questions responses for rog .1; notes from conversation .1
9/15/2015	ME	0.1	email MD regarding newly received CTS
9/15/2015			Transfer documents recd from ECF system to docket file and create file copy (Docket#56 - REPLY to Response to Motion re 48 MOTION for Summary Judgment by Kellogg Sales Company, Kellogg USA, Inc. (Attachments: # 1 Exhibit A - Bu[client]ett Dep Tr Excerpt, # 2 Exhibit B - Taylor Dep Tr Excerpt, # 3 Exhibit C - McCartt Dep Tr Excerpt)(Monsma, Timothy) Modified text on 9/10/2015. (AWD) (Entered: 09/09/2015) : 5:14-cv-00318-DCR-
	CLER	0.1	REW
9/15/2015			Transfer documents recd from ECF system to docket file and create file copy (Docket#58 - REPLY to Response to Motion re 49 MOTION in Limine by Kellogg Sales Company, Kellogg USA, Inc. (AWD) (Entered: 09/10/2015)- : 5:14-cv-00318-DCR-REW
	CLER	0.1	
9/15/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
9/15/2015	ME	0.1	draft amended answer to interrogatories for opt-in
9/15/2015	ME	0.1	update draft rog for opt-in based
9/15/2015	ME	0.4	draft email for opt-in's regarding amended answers to interrogatories
9/15/2015	ME	1.2	prepare opt-in's questions results for answers to interrogatories
9/15/2015	ME	0.1	email opt-in regarding amended answer to rog
9/15/2015	ME	0.1	email opt-in regarding amended answer to rog
9/16/2015			Transfer documents recd from ECF system to docket file and create file copy (Docket#321 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue, # (2) Consent to Sue, # (3) Consent to Sue)(Dunn, Matt)
	CLER	0.1	

Date	Staff	Amount of Time	Description
9/16/2015	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue, # (2) Consent to Sue, # (3) Consent to Sue)
9/16/2015	AG	0.4	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/16/2015	ME	0.1	email opt-in regarding amended answer to interrogatories
9/16/2015	ME	0.5	prepare opt-ins' documents for production to defense counsel
9/16/2015	ME	0.3	JP/ME meeting to discuss filing newly received Consents to Sue .2; and case organization .1
9/16/2015	CLER	0.3	prepare mailing to client (return of o[client]. documents and FedEx label)
9/16/2015	JP	0.3	JP/ME meeting to discuss filing newly received Consents to Sue .2; and case organization .1
9/16/2015	ME	0.1	email opt-in regarding amended answer to interrogatories
9/16/2015	ME	0.2	prepare shipping label to mail to opt-in
9/16/2015	ME	0.2	prepare documents to return to opt-in
9/16/2015	ME	0.2	organization of files on server
9/16/2015	CLER	0.2	prepare welcome ltr to new client
9/16/2015	ME	0.1	draft amended answer to interrogatories for opt-in
9/16/2015	CLER	0.2	prepare welcome ltr to new client
9/17/2015	CLER	0.2	prepare welcome ltr to new client
9/17/2015	ME	0.1	draft amended answer to interrogatories for opt-in
9/17/2015	ME	1.5	prepare documents for production to defense counsel
9/17/2015	ME	0.1	telephone call to DOL regarding FOIA request
9/17/2015	ME	0.1	JS/ME discuss process for following up regarding FOIA requests
9/17/2015	JS	0.1	JS/ME discuss process for following up regarding FOIA requests
9/17/2015	ME	0.1	listen to voicemail from opt-in
9/17/2015	CLER	0.5	create PDF format of document recd from clients
9/18/2015	JF	0.5	Revision and composition of an email to Janice regarding other claimants joining the Kellogg case
9/18/2015	ME	0.1	file opt-in's documents
9/21/2015	ME	0.2	JF/ME review filtering tracking sheet to create list of opt-ins to contact regarding completing questions for answer to interrogatories
9/21/2015	JP	0.5	JP/JF Instruction on phone calls to claimants who have not responded to Kellogg questions 0.5
9/21/2015	ME	0.4	JF/ME review task of updating tracking spreadsheet to include opt-ins who have recently completed rog questions
9/21/2015	ME	0.1	telephone call from opt-in regarding questions for rog
9/21/2015	JF	2.5	Calls to claimants with regards to completion of the questions.
9/21/2015	ME	0.1	review email to opt-ins regarding mediation for needed edits
9/21/2015	ME	0.1	JP/ME review status of phone calls to opt-ins who have not completed rog
9/21/2015	ME	0.3	email opt-in regarding case update and questions for answer to interrogatories
9/21/2015	JF	0.2	JF/ME review filtering tracking sheet to create list of opt-ins to contact regarding completing questions for answer to interrogatories
9/21/2015	JP	0.4	called to discuss retaliation concerns
9/21/2015	CLER	0.1	Data Entry of contact information of client
9/21/2015	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
9/21/2015	CLER	0.2	prepare welcome ltr to new client
9/21/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
9/21/2015	ME	0.1	review question on questions for answer to interrogatories
9/21/2015	ME	0.1	send email to opt-in to verify receipt of email
9/21/2015	JF	0.1	JF/ME discuss the status of email sent to opt-in
9/21/2015	ME	0.2	JF/ME provide background information of case



Date	Staff	Amount of Time	Description
9/21/2015	JP	0.1	JP/ME review status of phone calls to opt-ins who have not completed rog
9/21/2015	JF	0.1	JF/ME review providing case update regarding mediation to opt-ins
9/21/2015	ME	0.1	JF/ME review providing case update regarding mediation to opt-ins
9/21/2015	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Sue (Attachments: # (1) Consent to Sue)
9/21/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#322 - NOTICE of Filing of Consent to Sue ; filed by Plaintiff Patty Thomas. (Attachments: # (1) Consent to Sue)(Dunn, Matt)
9/21/2015	JF	0.5	JP/JF Instruction on phone calls to claimants who have not responded to Kellogg questions 0.5
9/21/2015	ME	0.2	telephone call from opt-in regarding case update .1; notes from conversation .1
9/21/2015	ME	0.1	review document sent by opt-in
9/21/2015	JF	0.1	review question on questions for answer to interrogatories
9/21/2015	JF	0.2	JF/ME provide background information of case
9/21/2015	JF	0.4	JF/ME review task of updating tracking spreadsheet to include opt-ins who have recently completed rog questions
9/21/2015	JF	0.8	Per ME; updating tracking spreadsheet for Kellogg case
9/22/2015	ME	0.1	telephone call with opt-in regarding clarifying answer on questions for answer to interrogatories
9/22/2015	ME	0.1	telephone call with opt-in regarding questions for rog
9/22/2015	ME	0.1	send email to opt-in regarding questions for answer to interrogatories
9/22/2015	JF	3.5	Calls to claimants with incomplete questions/fielding of return phone calls 3.5
9/22/2015	ME	0.1	telephone call with opt-in regarding questions for rog
9/22/2015	ME	0.1	send email to opt-in with link to questions for rog
9/22/2015	ME	0.2	review documents responsive to Nabisco FOIA request
9/22/2015	ME	0.1	file FOIA documents on server
9/22/2015	JF	0.2	Spoke to [client] 0.2
9/22/2015	MD	0.1	md email team about mediation status 0.1
9/22/2015	MD	0.2	md review DOL responses to FOIA request 0.2
9/22/2015	ME	0.1	email opt-in link to questions for rog
9/22/2015	JF	1	questions completion for [client], first on paper and then electronically submitted for questionnaire 1.0
9/23/2015	JF	0.1	MA/JF 2nd brief review of Table of Authorities practice document 0.6
9/23/2015	ME	0.7	update plt rog tracking spreadsheet to include information regarding newly received rogs
9/23/2015	ME	0.3	review status of opt-ins' answers to interrogatories
9/23/2015	MA	0.1	MA/JF 2nd brief review of Table of Authorities practice document 0.6
9/23/2015	ME	0.1	email AN to determine correct questions for rog to mail to opt-in
9/23/2015	DG	0.8	review SJ filings in McCartt to review possible concerns for adverse decision in a Kellogg RSR case .8
9/23/2015	ME	0.2	review sent emails and tracking sheet to determine who contacted opt-in
9/23/2015	JF	0.2	Checked email, [client] conversation from last night with Janice 0.2
9/23/2015	MD	0.3	md/dg discussing summary judgment filing in KY and next steps for calculating damages 0.3
9/23/2015	DG	0.3	md/dg discussing summary judgment filing in KY and next steps for calculating damages 0.3

Date	Staff	Amount of Time	Description
9/23/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#53 - ESPONSE in Opposition re 48 MOTION for Summary Judgment by Kellogg Sales Company, Kellogg USA, Inc. filed by James B. McCartt. (Attachments: # 1 Appendix Appendix, # 2 Exhibit Deposition of James Boudreau McCartt, # 3 INCORRECT Exhibit McCartt deposition exhibits, # 4 INCORRECT Exhibit Deposition of John Taylor, # 5 Exhibit Deposition of Megan Anderson, # 6 Exhibit Anderson deposition exhibits, # 7 Exhibit Deposition of Trish Bu[client]ett, # 8 Exhibit Bu[client]ett deposition exhibits, # 9 Exhibit Deposition of Kevin Grzanka, # 10 Exhibit Grzanka deposition exhibits, # 11 Proposed Order)(Roark, Robert) (Additional attachment(s) added on 8/27/2015: # 12 CORRECT Exhibit McCartt deposition exhibits, # 13 CORRECT Exhibit Deposition of John Taylor) (RCB). Modified text, restrictions on 8/27/2015 (RCB). (Entered: 08/26/2015) McCartt v. Kellogg
9/23/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#54 - RESPONSE in Opposition re 49 MOTION in Limine by Kellogg Sales Company, Kellogg USA, Inc. filed by James B. McCartt. (Attachments: # 1 Proposed Order)(Roark, Robert) Modified text on 8/27/2015 (RCB). (Entered: 08/26/2015) McCartt v. Kellogg
9/23/2015	ME	0.1	MD/ME discuss following up with FOIA response regarding Nabisco
9/23/2015	ME	0.1	send email with link to questions for rog to opt-in
9/24/2015	MD	0.2	md call with ME counsel about status of case 0.2
9/24/2015	JK	1.1	JK combined all state data into one large spread sheet
9/24/2015	ME	0.3	prepare questions for rog to mail to opt-in
9/24/2015	JP	1.6	DG/MR/MD/JP/ME litigation team meeting to prepare for mediation: review payroll data 1.1; determine timeline for completing settlement statement .2; review obtaining additional hours information from opt-ins .3
9/24/2015	MD	1.6	DG/MR/MD/JP/ME litigation team meeting to prepare for mediation: review payroll data 1.1; determine timeline for completing settlement statement .2; review obtaining additional hours information from opt-ins .3
9/24/2015	MR	1.6	DG/MR/MD/JP/ME litigation team meeting to prepare for mediation: review payroll data 1.1; determine timeline for completing settlement statement .2; review obtaining additional hours information from opt-ins .3
9/24/2015	DG	1.6	DG/MR/MD/JP/ME litigation team meeting to prepare for mediation: review payroll data 1.1; determine timeline for completing settlement statement .2; review obtaining additional hours information from opt-ins .3
9/24/2015	JK	0.5	JK/MR review newly produced payroll data .5
9/24/2015	JK	1.2	JK combine all payments received by plaintiffs within a one week period into one row for state data spreadsheet
9/24/2015	JK	0.7	JK find date range of produced data in opt in spreadsheet
9/24/2015	ME	0.2	save discovery documents produced by defense counsel on server
9/24/2015	JK	1.7	JK combine all payments received by plaintiffs within a one week period into one row for opt in data
9/24/2015	ME	1.6	DG/MR/MD/JP/ME litigation team meeting to prepare for mediation: review payroll data 1.1; determine timeline for completing settlement statement .2; review obtaining additional hours information from opt-ins .3
9/24/2015	JK	0.7	JK find date range of produced data in state spreadsheet
9/24/2015	AN	0.1	AN/ME discuss tracking questions for rogs that have been received via postal mail
9/24/2015	ME	0.1	AN/ME discuss tracking questions for rogs that have been received via postal mail

Date	Staff	Amount of Time	Description
9/24/2015	JK	0.6	JK determine which people from the state spreadsheet work for snacks
9/25/2015	DG	0.9	DG/ME discuss process for editing questions to opt-ins regarding hours worked (for damage calculations) .1; edit questionnaire questions of clients' hours .5; email to team re same .3
9/25/2015	ME	0.1	schedule litigation team meeting to finalize questions to opt-ins regarding hours worked for damage calculations
9/25/2015	ME	0.3	review draft questions for opt-ins regarding hours worked
9/25/2015	ME	0.5	draft email to opt-ins regarding questions for damage calculations
9/25/2015	ME	0.4	put questions regarding hours worked for damage calculations into a word document so that edits can be tracked .3; email to litigation team .1
9/25/2015	ME	0.1	DG/ME discuss process for editing questions to opt-ins regarding hours worked (for damage calculations)
9/25/2015	ME	0.1	JP/ME discuss review needed for the draft questions to opt-ins regarding hours worked
9/25/2015	JP	0.1	JP/ME discuss review needed for the draft questions to opt-ins regarding hours worked
9/25/2015	ME	0.1	review latest draft email to opt-ins regarding questions for hours worked
9/28/2015	MD	1.5	md drafting mediation statement 1.5
9/28/2015	JK	1.1	JK Combine payroll for Morning Foods into Biweekly .8
9/28/2015	JK	1.1	JK Combine payroll for snacks into Biweekly .8
9/28/2015	JK	1.3	JK compare duplicate payroll between all divisions
9/28/2015	MD	0.5	md researching law on filing an amicus curiae brief in ED KY 0.5
9/28/2015	JK	0.7	jk determine class payroll missing from opt ins
9/28/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
9/28/2015	JK	1.2	JK Find Date ranges of class, Morning foods and. snacks payroll
9/28/2015	JK	1.1	JK Combine payroll for Class into Biweekly .8
9/29/2015	ME	0.5	JF/ME review updating tracking spreadsheet to include information about documents opt-ins has as indicated in rog response
9/29/2015	MD	0.7	drafting mediation statement 0.7
9/29/2015	MD	1	md editing mediation statement 1.0
9/29/2015	DG	1.4	DG/MD/JP/ME litigation team meeting to finalize questions questions for opt-ins regarding hours worked for damage calculations/mediation
9/29/2015	ME	0.3	review background information helpful to drafting questions for opt-ins regarding hours worked for mediation damage calcs
9/29/2015	MD	1.4	DG/MD/JP/ME litigation team meeting to finalize questions questions for opt-ins regarding hours worked for damage calculations/mediation
9/29/2015	JP	1.4	DG/MD/JP/ME litigation team meeting to finalize questions questions for opt-ins regarding hours worked for damage calculations/mediation
9/29/2015	ME	0.3	review finalized questions to opt-ins about hours worked for damage calcs/mediation for any last edits needed before sending to opt-ins
9/29/2015	JK	0.8	JK review hire/fire dates for Morning Foods members
9/29/2015	JK	0.8	JK review hire/fire dates for class members
9/29/2015	JF	0.5	JF/ME review updating tracking spreadsheet to include information about documents opt-ins has as indicated in rog response
9/29/2015	JK	1.9	JK create possible rubric for damage calculations
9/29/2015	ME	1.4	DG/MD/JP/ME litigation team meeting to finalize questions questions for opt-ins regarding hours worked for damage calculations/mediation
9/29/2015	ME	0.3	calculate total number of opt-ins per MD's request
9/30/2015	ME	0.2	JP/ME discuss updating client tracking spreadsheet to indicate plaintiffs who would like to withdraw from the case

Date	Staff	Amount of Time	Description
9/30/2015	MD	0.2	md contact JAMMS about moving forward on mediation 0.2
9/30/2015	JF	0.1	JF/ME discuss status of mediation preparation
9/30/2015	ME	0.1	JF/ME discuss status of mediation
9/30/2015	JK	0.9	JK import state data from previous analysis into payroll master list
9/30/2015	JK	0.6	JK find date ranges for payroll master list
9/30/2015	MD	0.1	md/dg discussing filing amicus curiae brief in the ED KY 0.1
9/30/2015	JK	0.7	JK combine all labeled payroll data into on master list
9/30/2015	JK	0.4	JK label all produced payroll for tracking purposes
9/30/2015	DG	0.1	md/dg discussing filing amicus curie brief in the ED KY 0.1
9/30/2015	JK	0.4	JK label all produced payroll for tracking purposes
9/30/2015	ME	0.1	AN/ME discuss information about direct store delivery as it relates to the case
9/30/2015	JK	1.1	JK Remove duplicate weeks from produced morning foods data that occur in snacks data
9/30/2015	AN	0.1	AN/ME discuss information about direct store delivery as it relates to the case
9/30/2015	JK	1.3	JK Remove duplicate weeks from produced class payroll data that occur in snacks data
9/30/2015	DG	0.5	draft outline for McCartt amicus .5
9/30/2015	JP	0.2	JP/ME discuss updating client tracking spreadsheet to indicate plaintiffs who would like to withdraw from the case
9/30/2015	ME	0.2	telephone call from opt-in regarding case information .1; notes from conversation .1
9/30/2015	ME	0.2	telephone call from opt-in re email sent with case update .1; notes from conversation .1
9/30/2015	ME	0.1	email case update to opt-in
9/30/2015	ME	0.1	email information provided by opt-in to litigation team
10/1/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#56 - REPLY to Response to Motion re 48 MOTION for Summary Judgment by Kellogg Sales Company, Kellogg USA, Inc. (Attachments: # 1 Exhibit A - Bu[client]ett Dep Tr Excerpt, # 2 Exhibit B - Taylor Dep Tr Excerpt, # 3 Exhibit C - McCartt Dep Tr Excerpt)(Monsma, Timothy) Modified text on 9/10/2015. (AWD) (Entered: 09/09/2015)
10/1/2015	ME	0.3	update Kellogg client tracking spreadsheet to note those who have inquired about withdrawing from the case
10/1/2015	JP	0.2	JP/ME review work needed to prepare list of opt-ins to send questions regarding hours for damage calcs/mediation
10/1/2015	ME	0.2	JP/ME review work needed to prepare list of opt-ins to send questions regarding hours for damage calcs/mediation
10/1/2015	MD	0.8	md/dg discussing amicus brief in ED KY based on summary judgment filing in McCartt case
10/1/2015	DG	2.3	md/dg discussing amicus brief in ED KY based on summary judgment filing in McCartt case .8; outline amicus brief arguments 1; review exhibits supplied by def .5
10/1/2015	DG	0.3	dg/mr/jk discuss status of damage calcs for mediation, timing, and issues to be resolved to be ready for mediation .3
10/1/2015	MR	0.3	dg/mr/jk discuss status of damage calcs for mediation, timing, and issues to be resolved to be ready for mediation .3
10/1/2015	JK	0.3	dg/mr/jk discuss status of damage calcs for mediation, timing, and issues to be resolved to be ready for mediation .3

Date	Staff	Amount of Time	Description
10/1/2015			Transfer documents recd from ECF system to docket file and create file copy (Docket#48 - MOTION for Summary Judgment by Kellogg Sales Company, Kellogg USA, Inc. (Attachments: # 1 Memorandum in Support Memorandum, # 2 Exhibit A-Equal Opportunity Policy, # 3 Exhibit B - Anti-Discrimination Policy, # 4 Exhibit C-McCartt Deposition, # 5 Exhibit D-Resp. Plff's First Interrog., # 6 Exhibit Jan. 26, 2012 RSR Job Profile, # 7 Exhibit F-Taylor Deposition, # 8 Exhibit G-Grzanka Deposition, # 9 Exhibit H-Feb. 2, 2014 email from McCartt, # 10 Exhibit I-Period 12, 2012 Regional Score Card, # 11 Exhibit J-2012 Performance Development Plan, # 12 Exhibit K-Anderson Declaration, # 13 Exhibit L-Anderson Deposition, # 14 Exhibit M-Grzanka Declaration, # 15 Exhibit N-Cincinnati Zone Assessment, # 16 Exhibit O-Central Region 25 Mile Summary, # 17 Exhibit P-EEOC Intake Questionnaire, # 18 Exhibit Q-Severance Agreement, # 19 Exhibit R-EEOC Cha[client]e, # 20 Exhibit S-Comm. from Plaintiff to EEOC, # 21 Exhibit T-Notice of Right to Sue, # 22 Exhibit U-McCartt Submission to EEOC, # 23 Exhibit V-Work With Review, # 24 Proposed Order Proposed Order)(Monsma, Timothy) (Entered: 07/31/2015)McCartt v. Kellogg USA, Inc. et al
	CLER	0.6	
10/1/2015	ME	0.2	JP/ME troubleshoot issue with copying client emails into outlook in preparation of sending questions re hours worked
10/1/2015	JP	0.2	JP/ME troubleshoot issue with copying client emails into outlook in preparation of sending questions re hours worked
10/1/2015	ME	0.1	left voicemail for opt-in to verify opt-in received email
10/1/2015			53 - RESPONSE in Opposition re 48 MOTION for Summary Judgment by Kellogg Sales Company, Kellogg USA, Inc. filed by James B. McCartt. (Attachments: # 1 Appendix Appendix, # 2 Exhibit Deposition of James Boudreau McCartt, # 3 INCORRECT Exhibit McCartt deposition exhibits, # 4 INCORRECT Exhibit Deposition of John Taylor, # 5 Exhibit Deposition of Megan Anderson, # 6 Exhibit Anderson deposition exhibits, # 7 Exhibit Deposition of Trish Bu[client]ett, # 8 Exhibit Bu[client]ett deposition exhibits, # 9 Exhibit Deposition of Kevin Grzanka, # 10 Exhibit Grzanka deposition exhibits, # 11 Proposed Order)(Roark, Robert) (Additional attachment(s) added on 8/27/2015: # 12 CORRECT Exhibit McCartt deposition exhibits, # 13 CORRECT Exhibit Deposition of John Taylor) (RCB). Modified text, restrictions on 8/27/2015 (RCB). (Entered: 08/26/2015) McCartt v. Kellogg USA, Inc. et al
	AG	0.3	
10/2/2015	MD	0.2	md review mr request for more information and spreadsheet for damages 0.2
10/2/2015	MD	0.2	md/mr discuss timing for damage calculations 0.2
10/2/2015	JK	1.1	JK compile list of ID's for morning foods clients for hire, termination and state request
10/2/2015	ME	0.2	review status of responses to questions for hours worked for damage calcs/mediation
10/2/2015	MR	0.4	md/mr discussing information needed for damage calculations 0.4
10/2/2015	MD	0.4	md/mr discussing information needed for damage calculations 0.4
10/2/2015	JK	1.1	JK compile list of ID's for snacks division clients for hire, termination and state request
10/2/2015	MD	0.3	md research outside sales exemption cases similar to Kellogg 0.3
10/5/2015	JP	0.1	JP/ME discuss status of excluded client
10/5/2015	ME	0.1	file opt-in's scanned questions response for rog on server
10/5/2015	ME	1	compare client list to tracking spreadsheet for opt-in rog responses to review for any discrepancies and to add new opt-ins

Date	Staff	Amount of Time	Description
10/5/2015	ME	0.4	update tracking spreadsheet for opt-in's rog responses to reflect documents each opt-in indicated they had
10/5/2015	CLER	0.1	create PDF format of document recd from client (TM/RSR questions)
10/5/2015	ME	0.2	draft rog response for opt-in based on opt-in's questions responses
10/5/2015	ME	0.1	JP/ME discuss status of excluded client
10/5/2015	ME	0.3	review responses to questions to gather information regarding hours worked for damage calcs/mediation
10/6/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
10/6/2015	DG	0.1	DG/MR update on status of damages work
10/6/2015	ME	0.1	send email to opt-in with link to questions for rog
10/6/2015	MR	0.1	DG/MR update on status of damages work
10/6/2015	DG	3.4	draft amicus brief in McCartt 3.1; emails to MD re same .3
10/7/2015	ME	0.1	send email to opt-in with link to questions for rog
10/7/2015	ME	0.2	telephone call from opt-in to update contact information .1; notes from conversation .1
10/7/2015	ME	0.1	left voicemail for opt-in to verify receipt of email
10/7/2015	ME	0.1	JP/ME determine topics needed to discuss for next paralegal meeting
10/7/2015	ME	0.1	resend link to questions for rog to opt-in via email
10/7/2015	JP	0.1	JP/ME determine topics needed to discuss for next paralegal meeting
10/7/2015	ME	0.1	telephone call from opt-in regarding link to questions for rog
10/7/2015	ME	0.2	telephone call from opt-in regarding documents and question about damage calculations .1; notes from conversation .1
10/8/2015	ME	0.2	create list of topics to discuss at paralegal meeting
10/8/2015	ME	1	JP/ME paralegal meeting to discuss work needed to continue preparing interrogatories .7; discuss process for sending second email regarding questions to determine hours worked for damage calculations .1; determine other priorities to discuss with attorneys .2
10/8/2015	DG	1.6	draft McCartt amicus 1.5; email to Plts counsel re obtaining local counsel .1
10/8/2015	JP	1	JP/ME paralegal meeting to discuss work needed to continue preparing interrogatories .7; discuss process for sending second email regarding questions to determine hours worked for damage calculations .1; determine other priorities to discuss with attorneys .2
10/8/2015	JS	1.6	proof, edit, add table of contents and table of authorities, and format amicus brief
10/9/2015	MD	0.3	md editing mediation statement 0.3
10/9/2015	MR	1.2	review previous Defendant production relating to job titles, territories and dates
10/9/2015	MR	0.1	review email from MD about opt-in job titles
10/9/2015	MR	0.1	copy new class payroll info from Defendant to server
10/9/2015	MD	0.2	md/dg discussing legal arguments to add to motion in McCartt, facts to add, and securing local counsel 0.2
10/9/2015	MR	0.1	save new opt-in data emailed from Def Counsel to server
10/9/2015	MD	1	MD/DG/MR(in part)/JLP/ME litigation team meeting to discuss priority of tasks to complete post mediation .2; determine preparation needed for mediation .8
10/9/2015	MD	0.1	md review documents produced by defense counsel 0.1
10/9/2015	ME	1	MD/DG/MR(in part)/JLP/ME litigation team meeting to discuss priority of tasks to complete post mediation .2; determine preparation needed for mediation .8
10/9/2015	MR	0.1	MR/MD/ME discuss payroll and job history data produced by defense counsel
10/9/2015	MD	0.1	MR/MD/ME discuss payroll and job history data produced by defense counsel



Date	Staff	Amount of Time	Description
10/9/2015	ME	0.2	gather opt-in documents for attorney and IT to use to compare to data provided by defense counsel regarding work history
10/9/2015	MR	0.3	examine opt-in history data emailed from Def Counsel to server
10/9/2015	ME	0.1	save payroll documents produced by defense counsel
10/9/2015	ME	0.1	md/mr/me discussing information needed to calculate damages based on Kellogg's production of opt-in job history 0.2 (me 0.1)
10/9/2015	ME	0.1	MR/MD/ME discuss payroll and job history data produced by defense counsel
10/9/2015	MR	0.9	MD/DG/MR(in part)/JLP/ME litigation team meeting to discuss priority of tasks to complete post mediation .2; determine preparation needed for mediation .8
10/9/2015	DG	1	MD/DG/MR(in part)/JLP/ME litigation team meeting to discuss priority of tasks to complete post mediation .2; determine preparation needed for mediation .8
10/9/2015	JP	1	MD/DG/MR(in part)/JLP/ME litigation team meeting to discuss priority of tasks to complete post mediation .2; determine preparation needed for mediation .8
10/9/2015	ME	0.1	JP/ME review process for updating rog tracking spreadsheet to include information about opt-ins who have completed the questions for rog responses and who have documents
10/9/2015	MR	0.5	create list of job titles that show up in Defendant's Opt-In Payroll History for atty MD .4, email to MD and team .1
10/9/2015	MD	0.2	md/mr/me discussing information needed to calculate damages based on Kellogg's production of opt-in job history 0.2 (me 0.1)
10/9/2015	AN	0.2	JLP/AN Prepare spreadsheet to verify and update contact information for opt-ins based on responses to recent questions about hours worked
10/9/2015	DG	0.2	md/mr/me discussing information needed to calculate damages based on Kellogg's production of opt-in job history 0.2 (me 0.1)
10/9/2015	ME	0.2	gather opt-in's documents for attorney and IT to use to compare to data provided by defense counsel regarding work history
10/9/2015	MR	0.1	read and reply to email from para ME
10/9/2015	ME	0.2	gather opt-in's documents for attorney and IT to use to compare to data provided by defense counsel regarding work history
10/9/2015	JP	0.2	JLP/AN Prepare spreadsheet to verify and update contact information for opt-ins based on responses to recent questions about hours worked
10/9/2015	ME	0.1	save JAMS agreement on server
10/9/2015	JP	0.1	JP/ME review process for updating rog tracking spreadsheet to include information about opt-ins who have completed the questions for rog responses and who have documents
10/9/2015	DG	0.5	md/dg discussing legal arguments to add to motion in McCartt, facts to add, and securing local counsel 0.2; sign and send JAMS agreement .3
10/9/2015	MR	0.5	review new class payroll info from Def Counsel .1, amend list of job titles for MD .2, email to MD to request hire/term dates from Def Counsel .1, send email to MD about amended list of job titles .1
10/10/2015	MR	6.9	compare and identify differences between damages framework developed for 9/21 payroll data and data received on 10/9 3.7; examine previous TM matchup work 1.6, populate most (not all) 10-9 opt-in data with plaintiff names from previous data 1.1, attempt to populate some class names with data from other Def production .5
10/11/2015	MR	4.3	work on reconciling TM opt-ins and excluded to 10-9 payroll data 1.5, identify opt-ins missing from payroll data 1.0, try various approaches to match unidentified opt-ins Emp ID with names from other Def sources of production .9, combine opt-in and class data into single Excel sheet .9
10/12/2015	MR	0.1	email to team about any subsequent changes in TM status

Date	Staff	Amount of Time	Description
10/12/2015	MR	5.1	initial work in developing calculations framework .5;; normalize dates of payroll check dates .3; locate, customize and run script to combine rows of duplicate payroll dates 1.0; locate, customize and run script to create spread-bonus column 1.0, develop various approaches to identify tentative state of employment for opt-ins (not provided by Def) 2.3
10/12/2015	MR	0.8	develop to-do list for damages .8
10/13/2015	JK	1.5	JK organize newly produced employment data running dates by employee ID
10/13/2015	JK	1.9	JK organize newly produced employment data running dates by job title 1.9
10/13/2015	JP	0.4	JP/MR review work needed to be done relating to hours worked questions
10/13/2015	JK	1.3	JK Remove blank entries in Employment type field from newly produced employment data 1.3
10/13/2015	MA	0.1	JP/MA review how to zip a client file to send to client for review
10/13/2015	MR	2.5	continued work to establish as accurate state of employment as possible 2.5
10/13/2015	JP	0.1	JP/MA review how to zip a client file to send to client for review
10/13/2015	CLER	0.2	create PDF format of documents recd from client
10/13/2015	MD	0.5	md/mr discussing damage calculations for settlement purposes .5
10/13/2015	MD	1	md preparing amicus brief and motions for filing 1.0
10/13/2015	JP	0.9	call to review log books and hours of work, also discussed mediation process
10/13/2015	MR	0.1	email to para JP about SM work needed to be done
10/13/2015	MD	3.5	md researching state laws for including state claims 3.5
10/13/2015	MR	0.4	JP/MR review work needed to be done relating to hours worked questions
10/13/2015	MD	1.3	md drafting mediation statement 1.3
10/13/2015	MR	0.1	follow-up email to para JP about questions work regarding hours worked per week
10/13/2015	JK	0.3	JK review newly produced date of employment data .3
10/13/2015	DG	0.2	review motion papers for amicus in McCartt .2
10/13/2015	JK	0.3	JK organize and remove duplicates from newly produced date of employment data .3
10/13/2015	MR	0.5	md/mr discussing damage calculations for settlement purposes .5
10/13/2015	JK	1.1	JK begin to create algorithm to find range of employment from newly produced date of employment data .3
10/13/2015	AN	0.2	Telephone call with opt-in regarding questions of hours worked at Kellogg
10/13/2015	MR	0.5	gather State SOL and LD from previous cases .4, email this info to atty MD .1
10/13/2015	MR	0.6	write up several identified problems with opt-ins and class member data in payroll data .5, email to MD and team .1
10/13/2015	JF	0.1	email JP about the phone call received from Kellogg plaintiff Tamika Harris 0.1
10/13/2015	MR	2.4	work with BSN 48093 to extract states of employment for opt-ins and check those of class members
10/13/2015	AN	0.1	Compose email with link to questions regarding hours worked
10/14/2015	MD	0.2	md drafting email to defense counsel about missing data for damage calculations 0.2
10/14/2015	MR	1.2	work on prep in advance of upgrading systems so that Kellogg damage calcs can run smoother
10/14/2015	MR	0.2	reply to para JP email about problems with excel import of questionnaire data with numeric ranges (e.g. 5-10) .1; also in email describe approach to get statistical results on hours worked .1
10/14/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
10/14/2015	MD	4	md researching state law to calculate claims for damages for mediation 4.0
10/14/2015	MD	0.4	dg/md discuss further steps to address bad SJ decision in McCartt .3; call to Rob Roark re same .1

Date	Staff	Amount of Time	Description
10/14/2015	MR	0.4	brief examination of Def provided list of employment states for opt-ins
10/14/2015	JP	0.3	JP/MR review additional issues with JP work on SM data import and handling .3
10/14/2015	JP	0.3	JK/JP/MR confer on problems with SM import of excel data (JK posted time separately) .3
10/14/2015	DG	0.4	dg/md discuss further steps to address bad SJ decision in McCartt .3; call to Rob Roark re same .1
10/14/2015	DG	0.4	review McCartt v Kellogg summary judgment decision on outside sales .3; emails with McCartt attorney and our local counsel for amicus re same .1
10/14/2015	JK	2.1	JK Isolate employee leave of absence time periods in preparation for comparison to missing payroll dates
10/14/2015	JK	0.9	JK Determine method for tracking employee leave of absence
10/14/2015	JK	0.9	JK Format of questionnaire response data.
10/14/2015	JS	0.2	call for update, to update email address
10/14/2015	JK	1	JK create pivot table of weeks worked for each ID&Job title cross key
10/14/2015	MR	0.3	JK/JP/MR confer on problems with SM import of excel data (JK posted time separately) .3
10/14/2015	MR	0.4	discuss with JK need for percentage analysis of job titles in payroll data (JK time posted separately .2; email team statistics on job titles that were included in payroll data per JK analysis .2
10/14/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#69 - MEMORANDUM OPINION AND ORDER: Dfts' 49 Motion in Limine is DENIED. Signed by Judge Danny C. Reeves on October 8, 2015. (AWD) cc: COR (Entered: 10/08/2015)McCartt v. Kellogg USA, Inc. et al
10/14/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#71 - MEMORANDUM OPINION & ORDER: 1) 48 MOTION for Summary Judgment is GRANTED w respect to Pla's claims of retaliation, violation of the FLSA and KY wage/hour statute, and violation of KY public policy (Counts III through VIII). 2) 48 Motion for Summary Judgment is DENIED w respect to the remaining claims (Counts I and II). Signed by Judge Danny C. Reeves on 10/14/2015.(SCD)cc: COR (Entered: 10/14/2015)McCartt v. Kellogg USA, Inc. et al
10/14/2015	MR	0.3	JP/MR review additional issues with JP work on SM data import and handling .3
10/15/2015	MR	0.1	md/mr discussing damages to include in MN state claims 0.1
10/15/2015	MD	0.1	md/mr discussing damages to include in MN state claims 0.1
10/15/2015	DG	0.2	md/dg discussing status of case in Maine RSR case and steps to take to prevent bad decision 0.2
10/15/2015	MD	0.1	md/mr discussing California state claims to include in the damage calcs for mediation 0.1
10/15/2015	MR	0.2	md/mr discussing elements of damage calculations for mediation 0.2
10/15/2015	JK	2	JK Configure computer system to handle the magnitude of calculations required for such large,detailed analysis
10/15/2015	MD	0.2	md/mr discussing elements of damage calculations for mediation 0.2
10/15/2015	MR	4.5	continued work on damage calcs: analysis on state of employment data received from Def compared to other state data already compiled 2.5; incorporation of new state data into calculations 1.0; other work involving calculations 1.0
10/15/2015	DG	2.1	edit mediation statement 2.1
10/15/2015	DG	1.1	dg/jk/mr/jp/md meeting to discuss damage formulae for mediation 1.1
10/15/2015	JK	1.1	dg/jk/mr/jp meeting to discuss damage formulae for mediation 1.1
10/15/2015	JK	3.2	JK start work to determine number of leave of absence weeks job history date ranges

Date	Staff	Amount of Time	Description
10/15/2015	JP	1.1	dg/jk/mr/jp meeting to discuss damage formulae for mediation 1.1
10/15/2015	MD	1.1	dg/jk/mr/jp/md meeting to discuss damage formulae for mediation 1.1
10/15/2015	MR	1.1	dg/jk/mr/jp/md meeting to discuss damage formulae for mediation 1.1
10/15/2015	MD	0.3	md researching the number of hours Kellogg designed the RSR-DSD job for 0.3
10/15/2015	MR	0.5	create lists of class members with (1) payroll data in 2015, (2) payroll data in July 2015 or later, (3) Sept or Oct 2015 .4, examine lists and email list info to JK .1
10/15/2015	JK	1.8	JK determine number of weeks missing from payroll history date ranges before leave of absence weeks
10/15/2015	MD	0.2	md/dg discussing status of case in Maine RSR case and steps to take to prevent bad decision 0.2
10/15/2015	AN	0.2	Telephone call for update on questions regarding hours and case update
10/15/2015	MD	0.2	md write email to defense counsel about additional data needed to calculate damages 0.2
10/15/2015	MD	0.2	md review dg edits to mediation statement 0.2
10/16/2015	MR	0.2	md/mr discussing items for damage calculations 0.2
10/16/2015	MD	0.2	md/mr discussing items for damage calculations 0.2
10/16/2015	JK	1.9	jk create date ID matrix of produced payroll
10/16/2015	JK	3.5	JK install computer software required to calculate computationally heavy damage calculations
10/16/2015	MD	0.2	md/mr discussing items for damage calculations 0.2
10/16/2015	JK	1.7	jk create date ID matrix of produced payroll weeks
10/16/2015	CM	0.4	review co-counsel fees & costs (.1), add in co-counsel additional costs (.1), set up fee form to enter time on Monday (.2)
10/16/2015	JK	1.2	jk create date ID matrix of produced leave of absence
10/16/2015	MR	7.6	continued work on damage calcs incorporating state LD claims, testing and revising SOL and LD claim figures 3.0, reformatting damages calcs so calcs run more smoothly 1.4 , work on upgrades to system so that calculations can be performed without continual crashes 3.2
10/16/2015	CM	0.3	compile case costs to date for mediation (.3)
10/16/2015	JK	0.4	jk research matrix excel functions for data format
10/16/2015	MD	2.5	md modifying mediation statement and researching case law 2.5
10/17/2015	MR	1.1	continued work on incorporating state LD and interest into damage calcs for all three models
10/17/2015	DG	3.8	DG/MR/MD/JK/JP/ME litigation team meeting to finalize damage calculations/statement to be sent to mediator and defense counsel 2.0; review settlement facilitation strategy .2; discuss other tasks to complete before mediation date .1; read emails re damage calculation issues .4; draft outline of topics to discuss with class reps prior to mediation during conference call 1; review Kellogg vacation policy for damage calcs .1
10/17/2015	MR	2.5	initial work on questions hours analysis
10/17/2015	JK	1.7	jk write script to put matrix of leave of absence data into one column
10/17/2015	JK	1.9	jk determine which employees have no termination in payroll history
10/17/2015	JK	2.4	jk match payroll history to produced payroll weeks
10/17/2015	JK	0.9	jk determine the last job title for all employees with no termination date
10/17/2015	MR	0.9	jk/mr write script to put matrix of leave of absence data into one column
10/18/2015	MR	1.5	continued work on questions hours Snacks data

Date	Staff	Amount of Time	Description
10/18/2015	MR	2.8	complete questions hours analysis for Snacks .5; complete questions hours analysis for Morning Foods data .7; compose and send email to team with results of hours analysis .2; create weekly claim stats based on hybrid, 55, original complaint date 1.0; investigate opt-outs and opt-ins missing from payroll data in relation to extrapolations .2; review and discuss extrapolation calculation issues with JK .2
10/18/2015	MR	3.4	create initial totals pages and initial summary page
10/18/2015	JK	2.2	JK investigation of defendant leave of absence date recording methods
10/18/2015	JK	1.9	JK analysis of gaps in payroll by class or opt-in
10/18/2015	JK	1.8	JK analysis of gaps in payroll by job title
10/18/2015	JK	1.5	JK analysis of gaps in payroll by state
10/19/2015	CLER	0.1	file documents sent by opt-in
10/19/2015	ME	0.2	review documents sent by opt-in
10/19/2015	JK	3.2	JK Write VBA script to isolate and record leave of absence weeks into a IDx Date Matrix
10/19/2015	AG	0.2	conduct weekly pacer search of active FLSA cases against Defendants
10/19/2015	ME	2.3	DG/MR/MD/JK/JP/ME litigation team meeting to finalize damage calculations/statement to be sent to mediator and defense counsel 2.0; review settlement facilitation strategy .2; discuss other tasks to complete before mediation date .1
10/19/2015	JK	0.2	dg review status of calcs with MR and JK .2
10/19/2015	MR	2.3	DG/MR/MD/JK/JP/ME litigation team meeting to finalize damage calculations/statement to be sent to mediator and defense counsel 2.0; review settlement facilitation strategy .2; discuss other tasks to complete before mediation date .1
10/19/2015	JK	2.3	DG/MR/MD/JK/JP/ME litigation team meeting to finalize damage calculations/statement to be sent to mediator and defense counsel 2.0; review settlement facilitation strategy .2; discuss other tasks to complete before mediation date .1
10/19/2015	MD	2.3	DG/MR/MD/JK/JP/ME litigation team meeting to finalize damage calculations/statement to be sent to mediator and defense counsel 2.0; review settlement facilitation strategy .2; discuss other tasks to complete before mediation date .1
10/19/2015	MR	0.2	dg review status of calcs with MR and JK .1
10/19/2015	JP	2.3	DG/MR/MD/JK/JP/ME litigation team meeting to finalize damage calculations/statement to be sent to mediator and defense counsel 2.0; review settlement facilitation strategy .2; discuss other tasks to complete before mediation date .1
10/19/2015	ME	0.2	telephone call from opt-in regarding sending documents to our office .1; notes from conversation .1
10/19/2015	CM	0.8	prepare updated costs and fees for mediation (.8)
10/19/2015	MD	0.2	md/dg discussing barriers to resolution at mediation 0.2
10/19/2015	ME	0.2	locate document produced by defense counsel that details vacation leave to assist with damage calculations
10/19/2015	MD	0.1	MD/CM review estimated additional fees and costs to be included with mediation amounts (.1)
10/19/2015	DG	0.3	review status of calcs with MR and JK .3
10/19/2015	JK	2.5	JK analysis of payroll gaps for class
10/19/2015	ME	0.1	file mediation schedule letter from mediator's office

Date	Staff	Amount of Time	Description
10/19/2015	CLER	0.2	create PDF format of correspondence recd from JAMS ( mediation confirmation and enclosures)
10/19/2015	CM	0.1	MD/CM review estimated additional fees and costs to be included with mediation amounts (.1)
10/19/2015	MD	1	md editing mediation statement 1.0
10/19/2015	ME	0.2	prepare shipping label for opt-in to use to send documents to our office
10/19/2015	MD	0.1	md/dg discussing providing clients damage calculations for settlement 0.1
10/19/2015	DG	0.2	md/dg discussing barriers to resolution at mediation 0.2
10/19/2015	JK	1.2	JK analysis of payroll gaps for clients
10/19/2015	DG	0.1	md/dg discussing providing clients damage calculations for settlement 0.1
10/19/2015	JK	1.2	JK Write VBA script to transcribe work history from matrix as a single excel column
10/20/2015	DG	1	final edits to mediation statement 1
10/20/2015	ME	0.1	MD/ME discuss fax received from client regarding consent to sue
10/20/2015	AN	0.1	Check notices and postcards returned in the mail for individual late opt-in
10/20/2015	MR	0.3	md/mr discussing edits to damages calculations 0.3
10/20/2015	JF	0.1	jp/jf instructions to jf to compile [client]'s excel tracking spreadsheet 0.1
10/20/2015	CLER	0.1	Data Entry of contact information
10/20/2015	MD	0.1	md/dg discuss additional time to file mediation statement 0.1
10/20/2015	MD	0.1	md call with defense counsel about client's presence at mediation and extension of time for mediation statement 0.1
10/20/2015	JF	2.2	Compile [client]'s work hours into comprehensive excel spreadsheet (2012) 2.2
10/20/2015	ME	0.1	send follow up email to the department of labor regarding FOIA request
10/20/2015	MD	1	md edit mediation statement 1.0
10/20/2015	DG	0.1	md/dg discuss additional time to file mediation statement 0.1
10/20/2015	ME	0.2	save newly received consent to sue that was faxed by intake
10/20/2015	DG	0.1	dg/md review whether we agreed to have client not be present for mediation and discuss how to best handle .1
10/20/2015	ME	0.1	email MD regarding newly received consent to sue
10/20/2015	JK	2.5	JK adjust script to place new payroll history data into a date ID matrix
10/20/2015	MD	0.1	dg/md review whether we agreed to have client not be present for mediation and discuss how to best handle .1
10/20/2015	ME	0.1	MD/ME discuss information needed for mediation statement
10/20/2015	JF	2.1	Calculate driving time in [client]'s excel tracking spreadsheet 2.1
10/20/2015	MD	0.1	MD/ME discuss fax received from client regarding consent to sue
10/20/2015	MD	0.3	md reviewing damage calculations 0.3
10/20/2015	MD	0.3	md/mr discussing edits to damages calculations 0.3
10/20/2015	MD	0.1	MD/ME discuss information needed for mediation statement
10/20/2015	JK	1.4	JK adjust script to create date id matrix of payroll history for new data
10/20/2015	JF	0.3	jp/jf instructions to calculate driving time in [client]'s excel tracking spreadsheet 0.3
10/20/2015	JK	1.1	JK create new matrix of LOA data to include new data
10/20/2015	JK	0.5	JK run script to place new payroll history data into a date ID matrix
10/20/2015	JP	0.1	jp/jf instructions to jf to compile [client]'s excel tracking spreadsheet 0.1
10/20/2015	JP	0.3	jp/jf instructions to calculate driving time in [client]'s excel tracking spreadsheet 0.3
10/20/2015	JK	1.4	JK analysis of gaps in payroll history
10/20/2015	ME	0.2	review draft mediation statement
10/20/2015	CLER	0.1	create PDF format of CTS
10/20/2015	JF	0.8	Compile [client]'s work hours into comprehensive excel spreadsheet (2013) 0.8



Date	Staff	Amount of Time	Description
10/20/2015	JK	0.6	JK explore morning foods or snacks designations for all job titles
10/20/2015	ME	2.1	gather information and documents needed for mediation statement
10/21/2015			locate information from opt-in's who defendants have not provided information regarding dates of employment and job title for damage calculations to prepare for mediation
	ME	0.2	
10/21/2015	JK	0.6	JK create list of extrapolations per job title
10/21/2015	JK	0.8	JK recalculate payroll gaps based on new statute of limitation start dates
10/21/2015	MR	2.1	engage in 14-email thread with MD about facts and statistics needed in mediation statement .7, generate answers to MD for mediation statement 1.4
10/21/2015	MD	2	md preparing and finalizing mediation statement to send to Kellogg/mediator 2.0
10/21/2015	ME	0.6	prepare opt-ins' interrogatory responses to be mailed to opt-ins for review
10/21/2015	JK	1.2	JK extrapolate number of weeks from last produced payroll date until 6/1/2016
10/21/2015	JK	1.2	JK identify current employees
10/21/2015	JK	1.2	JK isolate current employees from payroll history
10/21/2015	JK	0.3	JK adjust statute of limitation dates of payroll extrapolation
10/21/2015	JK	0.6	JK devise method to determine current employees
10/21/2015	JK	1.2	JK fix error in payroll history matrix recombining the individual matrix parts
10/21/2015	DG	2	edit mediation statement 2
10/21/2015	ME	0.3	review emails regarding damage calculations for mediation
10/21/2015	JK	0.7	JK Identify error in payroll history matrix
10/21/2015	ME	2.2	update damage calculations spreadsheet to include the total number of weeks worked within SOL for each opt-in
10/21/2015	MD	0.2	md/mr discussing damage calculations for mediation 0.2
10/21/2015	MR	0.2	md/mr discussing damage calculations for mediation 0.2
10/21/2015	MD	0.2	md/jp discussing edits to mediation statement 0.2
10/21/2015	ME	0.2	telephone call to opt-in to determine dates of employment and job title
10/21/2015	MD	0.1	md/dg discussing mediation statement submission along with damages 0.1
10/21/2015	JP	0.2	md/jp discussing edits to mediation statement 0.2
10/21/2015	MD	0.5	dg/mr/md discuss final damage calc issues with respect to extrapolations .4; dg/md discuss mediation statement changes re introduction .1
10/21/2015	DG	0.1	md/dg discussing mediation statement submission along with damages 0.1
10/21/2015	MR	0.4	dg/mr/md discuss final damage calc issues with respect to extrapolations .4;
10/21/2015	MD	0.1	md email defense counsel about exchange of mediation statement 0.1
10/21/2015	MD	0.3	md edit mediation statement 0.3
10/21/2015	DG	0.5	dg/mr/md discuss final damage calc issues with respect to extrapolations .4; dg/md discuss mediation statement changes re introduction .1
10/22/2015	AN	0.2	Telephone call with opt-in to check contact information
10/22/2015	MD	1	MD/DG/JP/MR/ME meet to discuss logistics and preparation needed for mediation
10/22/2015	AN	0.1	Compose email to opt-in to confirm current telephone number
10/22/2015	DG	1	MD/DG/JP/MR/ME meet to discuss logistics and preparation needed for mediation
10/22/2015	JK	0.9	JK create figure to illustrate leave of absence exclusions from gap analysis
10/22/2015	MR	1	MD/DG/JP/MR/ME meet to discuss logistics and preparation needed for mediation
10/22/2015	MD	0.1	md/mr discussing how to explain hybrid calculation for damages narrative 0.1
10/22/2015	MR	0.1	md/mr discussing how to explain hybrid calculation for damages narrative 0.1
10/22/2015	JP	1	MD/DG/JP/MR/ME meet to discuss logistics and preparation needed for mediation

Date	Staff	Amount of Time	Description
10/22/2015	AG	0.6	prepare documents for mediation (Honorable Diane Welsh)(Mediation Statement, Exhibit 1, Damage Calculations on a CD and Summary Sheet of Damage Calculations)
10/22/2015	MD	0.6	md edit extrapolation summary 0.6
10/22/2015	AN	0.1	Telephone call to opt-in regarding contact information
10/22/2015	JF	2	Calculate [client]'s work hours excluding the drive time (2012, 2013) 2.0
10/22/2015	JF	1.6	Calculate [client]'s work hours excluding the drive time (2011, 2010) 1.6
10/22/2015	MR	0.7	investigate issue of hourly pay rate of Kellogg reps .6, send email to MD describing problem with hourly pay .1
10/22/2015	AN	0.1	Telephone call to opt-in to check contact information
10/22/2015	AN	0.2	Telephone call with opt-in regarding contact information
10/22/2015	JK	3	JK Write narrative of damage calculation gap analysis
10/22/2015	JK	0.7	JK create figure to illustrate different types of gaps in produced payroll history
10/22/2015	ME	0.2	telephone call from opt-in regarding questions for answers to interrogatories .1; notes from conversation .1
10/22/2015	AN	0.1	Telephone call to opt-in to confirm contact information
10/22/2015	MR	0.1	read MD email about hourly pay and compose and send reply email suggesting better clarity in comments about hourly pay received by RSR DSD and RSR MF.
10/22/2015	AN	0.2	Telephone call with opt-in regarding contact information
10/22/2015	DG	1.5	dg/jp/md conference call with named plaintiffs to review settlement/mediation process 1.5
10/22/2015	ME	1	MD/DG/JP/MR/ME meet to discuss logistics and preparation needed for mediation
10/22/2015	JP	1.5	dg/jp/md conference call with named plaintiffs to review settlement/mediation process 1.5
10/22/2015	MD	1.5	dg/jp/md conference call with named plaintiffs to review settlement/mediation process 1.5
10/22/2015	MR	0.4	md/mr discussing edits hybrid calculation for damages 0.4
10/22/2015	MD	0.4	md/mr discussing edits hybrid calculation for damages 0.4
10/22/2015	ME	0.1	email questions for answer to interrogatories to opt-in
10/22/2015	MD	2	md editing and finalizing mediation statement and documents to send to mediator 2.0
10/22/2015	ME	1.5	JP/ME meet to organize file folder of documents needed for mediation .5; review tasks needed to complete post mediation 1.0
10/22/2015	JS	0.1	plt called to confirm correct address
10/22/2015	JF	1.2	Compile [client]'s work hours into comprehensive excel spreadsheet (2011) 1.2
10/22/2015	MR	6.1	compose damage calculation narrative
10/22/2015	DG	0.3	edit gap narrative .3
10/22/2015	JF	0.8	Compile [client]'s work hours into comprehensive excel spreadsheet (2010) 0.8
10/22/2015	AN	0.2	Telephone call to opt-in to check current phone numbers
10/22/2015	JP	1.5	JP/ME meet to organize file folder of documents needed for mediation .5; review tasks needed to complete post mediation 1.0
10/22/2015	AN	1	Update spreadsheet tracking opt-in contact information
10/22/2015	MD	0.5	md reviewing/editing analysis of damage calculations 0.5
10/22/2015	AN	0.2	Compose email to confirm opt-in's mailing address
10/22/2015	AN	0.2	Telephone call to opt-in regarding contact information
10/22/2015	AN	0.1	Telephone call with opt-in regarding contact information
10/22/2015	AN	0.2	Telephone call with opt-in re contact information

Date	Staff	Amount of Time	Description
10/22/2015	MR	0.7	examine last year's damage calculations for Morning Foods reps .4, compose email to team about comparison of last year's calculations to this years MF calculations .3
10/23/2015	AN	0.1	Telephone call to opt-in regarding contact information listed on hours questions
10/23/2015	MR	0.1	JP/MR discuss need for paralegal to investigate severance pay on pay stubs
10/23/2015	AN	0.2	Telephone call with opt-in to confirm contact information and discuss case update
10/23/2015	ME	0.5	read defendant's mediation statement
10/23/2015	ME	0.1	ME/AN Discuss name of opt-in as listed in database
10/23/2015	ME	0.9	JP/ME meet to determine process needed for verifying that received client docs have been produced
10/23/2015	ME	0.2	JK/ME discuss reviewing opt-in's paystubs for mediation
10/23/2015	AN	0.1	Compose email to opt-in to confirm contact information
10/23/2015	AN	0.1	ME/AN Discuss name of opt-in as listed in database
10/23/2015	AN	0.1	Compose email to opt-in to confirm current contact information
10/23/2015	MR	0.2	JP/MR discuss weekly averages of client's time logs
10/23/2015	MR	0.2	review and comment on MD edits of damage calculations narrative
10/23/2015	AN	0.1	Compose email to opt-in to confirm contact information
10/23/2015	ME	3.1	MR/JP/DG/MD/JK/ME meet to determine risk factors for rational settlement number
10/23/2015	MD	0.3	md editing gap narrative for submission to Kellogg and mediator 0.3
10/23/2015	JP	0.2	JP/MR discuss weekly averages of client's time logs
10/23/2015	AN	0.1	Compose email to opt-in regarding contact information listed in questions about hours worked at Kellogg
10/23/2015	CLER	1.2	create PDF format of documents recd from client
10/23/2015	MR	0.1	MR/ME discuss task to be completed to prepare for mediation
10/23/2015	ME	0.1	MD/ME discuss conversation with intake who sent consent to sue
10/23/2015	JF	3.1	Verify status of the receipt and production of client documents 3.1
10/23/2015	CLER	0.1	create PDF format of document recd from client (TM/RSR to prepare Answer to Interrogatories)
10/23/2015	MR	0.4	compiled weekly averages of client's time logs .2, compose email to team about time logs averages .2
10/23/2015	AN	0.3	Update spreadsheet tracking contact information for opt-ins
10/23/2015	ME	0.1	MR/ME discuss task to be completed to prepare for mediation
10/23/2015	MD	0.1	MD/ME discuss conversation with intake who sent consent to sue
10/23/2015	CLER	0.3	prepare mailing to Hon. Diane Welsh ( Conf. Mediation Statement)
10/23/2015	ME	0.3	telephone call to intake who sent consent to sue this week .2; notes from conversation .1
10/23/2015	JK	0.1	JK/ME review opt-in paystubs
10/23/2015	MR	0.3	MD/MR confer on several aspects of risk discounts in damage calculations
10/23/2015	ME	0.1	JK/ME review opt-in paystubs
10/23/2015	JK	0.7	JK make edits to gap analysis essay
10/23/2015	MR	5.1	create chart of risk discounts for damage calcs 1.0, work on structuring summary page to accommodate risk discounts, rational settlement and offer tool components 4.1;
10/23/2015	MR	0.2	MR/ME review opt-in's paystubs as part of preparation for mediation
10/23/2015	ME	0.1	telephone call from opt-in regarding termination date
10/23/2015	MR	0.4	examine aspects for taking Kellogg files (totaling 70gb) down to mediation .2; look at website to get hard drive by Tuesday for this purpose .2

Date	Staff	Amount of Time	Description
10/23/2015	MD	0.3	MD/MR confer on several aspects of risk discounts in damage calculations
10/23/2015	JK	3.1	MR/JP/DG/MD/JK/ME meet to determine risk factors for rational settlement number
10/23/2015	MD	3.1	MR/JP/DG/MD/JK/ME meet to determine risk factors for rational settlement number
10/23/2015	JP	0.9	JP/ME meet to determine process needed for verifying that received client docs have been produced
10/23/2015	JK	0.2	JK/ME discuss reviewing opt-in's paystubs for mediation
10/23/2015	ME	0.3	JP/JF/ME meet to review process for JF to verify status of the receipt and production of client documents
10/23/2015	AN	0.2	Telephone call with opt-in to discuss case update and contact information
10/23/2015	MR	3.1	MR/JP/DG/MD/JK/ME meet to determine risk factors for rational settlement number
10/23/2015	MR	0.2	consider methods by which to add calculations to take in account severance pay concern
10/23/2015	DG	3.1	MR/JP/DG/MD/JK/ME meet to determine risk factors for rational settlement number
10/23/2015	JP	3.1	MR/JP/DG/MD/JK/ME meet to determine risk factors for rational settlement number
10/23/2015	DG	0.9	dg/md/ms call to Jim Finbe[client] re mediation practice for damage cases in this range .3; discuss additional mediation strategy issues .2; read defendant's mediation statement .4
10/23/2015	JP	0.1	JP/MR discuss need for paralegal to investigate severance pay on pay stubs
10/23/2015	MR	0.2	send plaintiffs damage calcs to defense counsels via sendthisfile FTP
10/23/2015	ME	0.2	MR/ME review opt-in's paystubs as part of preparation for mediation
10/23/2015	ME	0.1	listen to voicemail from opt-in regarding conference call for mediation
10/23/2015	MS	0.5	dg/md/ms call to Jim Finbe[client] re mediation practice for damage cases in this range .3; discuss additional mediation strategy issues .2
10/23/2015	JK	1.1	JK new gap analysis including severance
10/23/2015	JK	0.8	JK combine severance week matrix with payroll history matrix
10/23/2015	ME	0.1	verify opt-in's last name listed on documents produced by defense counsel
10/23/2015	MR	1.2	address problems of extreme slowness of excel damage calcs files
10/23/2015	JK	1.5	JK create matrix of severance pay weeks from work history
10/23/2015	JP	0.3	JP/JF/ME meet to review process for JF to verify status of the receipt and production of client documents
10/23/2015	AN	0.1	Telephone call with opt-in to update contact information
10/23/2015	ME	0.1	read email from attorney MD with information concerning person who recently sent a consent to sue
10/23/2015	JF	0.3	JP/JF/ME meet to review process for JF to verify status of the receipt and production of client documents
10/23/2015	AN	0.3	Telephone call with opt-in for case update and contact information correction
10/24/2015	MR	1.5	create combined totals page for plaintiffs of both Snacks plaintiffs totals and Morning Food plaintiff totals 1.5
10/24/2015	MR	1.3	run tests to see how much we are overall discounting FLSA claims of opt-ins .7, write up results of tests and email to team .6
10/24/2015	MR	2.2	continued work on incorporating litigation risk discount adjustables into plaintiffs version of damage calculations, i.e. make major revisions to detail sheets and total sheets for SN and MF so that 1.5/hybrid/.5 methods can be blended 2.2

Date	Staff	Amount of Time	Description
10/24/2015	MR	1.6	attempt to purchase external hard drive for mediation .3 (store was out of drives), examine existing portable hard drives .3, secure erase old stuff off existing portable hard drive and sync case folders onto hard drive 1.0
10/26/2015	MD	2	md research for mediation re FWW and additional state law claims 2.0
10/26/2015	JK	2.8	JK calculate the average paid time off hours per year from produced time off data
10/26/2015	JF	2.7	Verify status of the receipt and production of client documents 2.7
10/26/2015	ME	2	prepare documents for mediation
10/26/2015	ME	2.5	review opt-in paystubs to prepare information for mediation purposes
10/26/2015	MD	1.1	md/dg debating initial demand, and other settlement components for mediation 1.1
10/26/2015	MD	2	md preparing for mediation (reviewing case law re liquidated damages and reviewing documents to bring) 2.0
10/26/2015	JK	1.6	JK Pulled Gap data for job titles used in extrapolation
10/26/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
10/26/2015	MD	0.6	md finalizing narrative for mediation 0.6
10/26/2015	ME	1.6	MR/JK/MD/JP/DG/ME meet to review discount calculations and accuracy for purposes of mediation
10/26/2015	JF	2.7	Verify status of the receipt and production of client documents 2.7
10/26/2015	ME	0.1	left voicemail for intake
10/26/2015	MD	0.1	md send damages narrative to defense counsel and mediator 0.1
10/26/2015	JP	1.6	MR/JK/MD/JP/DG/ME meet to review discount calculations and accuracy for purposes of mediation
10/26/2015	DG	1.6	MR/JK/MD/JP/DG/ME meet to review discount calculations and accuracy for purposes of mediation
10/26/2015	ME	0.1	telephone call from intake to gather employment information
10/26/2015	MR	1.6	MR/JK/MD/JP/DG/ME meet to review discount calculations and accuracy for purposes of mediation
10/26/2015	DG	1.1	md/dg debating initial demand, and other settlement components for mediation 1.1
10/26/2015	MD	0.3	md drafting list of statistics that Plaintiffs need for mediation 0.4
10/26/2015	MD	1.6	MR/JK/MD/JP/DG/ME meet to review discount calculations and accuracy for purposes of mediation
10/26/2015	JK	1.6	MR/JK/MD/JP/DG/ME meet to review discount calculations and accuracy for purposes of mediation
10/27/2015	JK	11.5	Mediation in NYC - travel to and from mediation (discuss case and strategy and results during trip) 3.5; attend mediation 7.0; discuss results and information from mediation and next steps 1.0
10/27/2015	MR	11.5	Mediation in NYC - travel to and from mediation (discuss case and strategy and results during trip) 3.5; attend mediation 7.0; discuss results and information from mediation and next steps 1.0
10/27/2015	ME	8.5	Mediation in NYC - travel to and from mediation (discuss case and strategy and results during trip) 3.5; attend mediation 7.0; discuss results and information from mediation and next steps 1.0
10/27/2015	AN	0.1	Respond to email regarding contact information
10/27/2015	MD	11.5	Mediation in NYC - travel to and from mediation (discuss case and strategy and results during trip) 3.5; attend mediation 7.0; discuss results and information from mediation and next steps 1.0
10/27/2015	MR	0.4	list many of the items we discussed during and after mediation as to-do items for case

Date	Staff	Amount of Time	Description
10/27/2015	AN	0.1	Reply to email regarding contact information
10/27/2015	DG	11.5	Mediation in NYC - travel to and from mediation (discuss case and strategy and results during trip) 3.5; attend mediation 7.0; discuss results and information from mediation and next steps 1.0
10/27/2015	MA	0.2	call from opt-in to discuss case updates
10/28/2015	ME	0.2	review defendant's motion to compel discovery responses and dismiss unresponsive plaintiffs
10/28/2015	JP	0.4	JP/MR confer on damage calc figures to share with class reps .2, discuss issues about case going forward .2
10/28/2015	JF	0.8	JF/ME review task for comparing defendant's and our data regarding plaintiff production
10/28/2015	JF	2.8	Compare defendant's and our data regarding plaintiff production 2.8
10/28/2015	JP	0.1	JF/ME review discrepancy in def data regarding opt-in production
10/28/2015	ME	0.2	JS/ME review effectively communicating with intakes regarding statute of limitations
10/28/2015	JP	1.5	create list of tasks needed to complete for discovery post mediation
10/28/2015	ME	0.2	JP/ME discuss following up with named plaintiffs regarding case update
10/28/2015	ME	1.5	create list of tasks needed to complete for discovery post mediation
10/28/2015	ME	0.1	DG/ME discuss following up with named plaintiffs regarding case update
10/28/2015	JP	0.2	JP/ME discuss following up with named plaintiffs regarding case update
10/28/2015	DG	1.5	MD/JP/MR/DG/ME meeting to review next steps for continuing litigation post mediation .3; and to develop plan for completing discovery 1.2
10/28/2015	MR	1.5	MD/JP/MR/DG/ME meeting to review next steps for continuing litigation post mediation .3; and to develop plan for completing discovery 1.2
10/28/2015	JP	1.5	MD/JP/MR/DG/ME meeting to review next steps for continuing litigation post mediation .3; and to develop plan for completing discovery 1.2
10/28/2015	MD	1.5	MD/JP/MR/DG/ME meeting to review next steps for continuing litigation post mediation .3; and to develop plan for completing discovery 1.2
10/28/2015	ME	1.5	MD/JP/MR/DG/ME meeting to review next steps for continuing litigation post mediation .3; and to develop plan for completing discovery 1.2
10/28/2015	ME	0.1	JF/ME review discrepancy in def data regarding opt-in production
10/28/2015	ME	0.2	compile list of discovery tasks to be completed to prepare for paralegal meeting
10/28/2015	DG	0.1	DG/ME discuss following up with named plaintiffs regarding case update
10/28/2015	ME	0.8	JF/ME review task for comparing defendant's and our data regarding plaintiff production
10/28/2015	MD	0.1	md email defense counsel about call to discuss completing discovery 0.1
10/28/2015	JS	0.2	JS/ME review effectively communicating with intakes regarding statute of limitations
10/28/2015	ME	0.3	review task discovery task regarding rogs to delegate to JF
10/28/2015	MD	0.1	md email plaintiffs' counsel about call to discuss status of case 0.1
10/28/2015	MR	0.4	JP/MR confer on damage calc figures to share with class reps .2, discuss issues about case going forward .2
10/28/2015	ME	0.1	schedule team meeting
10/28/2015	MD	0.4	identify tasks that need to be completed and type of notes from meeting 0.4
10/28/2015	ME	0.3	investigate data discrepancies between defendant's and our data regarding opt-in production
10/28/2015	ME	0.2	telephone call with intake regarding filing CTS .1; notes from conversation .1
10/29/2015	JF	1.9	Compare defendant's and our data regarding plaintiff production 1.9
10/29/2015	ME	0.2	MD/ME follow up on tasks to be completed post mediation



Date	Staff	Amount of Time	Description
10/29/2015	MD	0.5	MD/ME meet to discuss preparing for plaintiff depositions
10/29/2015	ME	0.1	send email to opt-in regarding initial notification of deposition
10/29/2015	MD	0.1	md send Kellogg counsel email about scheduled call 0.1
10/29/2015	ME	0.2	JF/ME review discrepancies in opt-in production data provided by defense counsel
10/29/2015	ME	0.1	locate documents produced by defense counsel
10/29/2015	MD	0.2	ms/md discuss process for defending depositions for additional 20 discovery reps
10/29/2015	ME	0.2	verify if opt-in completed interrogatory
10/29/2015	MS	0.2	ms/md discuss process for defending depositions for additional 20 discovery reps
10/29/2015	ME	0.5	MD/ME meet to discuss preparing for plaintiff depositions
10/29/2015	MD	0.5	md create to-do list for deposition of additional deponents 0.5
10/29/2015	ME	0.2	review documents produced by defense counsel
10/29/2015	MD	0.3	prepare for call with defense counsel about completing litigation 0.3
10/29/2015	JS	0.1	JS/ME discuss what to include in draft mediation update to named plaintiffs
10/29/2015	MD	0.6	md/dg call with plaintiffs' counsel in RSR Maine case about case strategy 0.6
10/29/2015	ME	0.2	send email to named plaintiffs regarding mediation update
10/29/2015	ME	0.1	JS/ME discuss what to include in draft mediation update to named plaintiffs
10/29/2015	MD	0.1	md call to defense counsel about continuing litigation 0.1
10/29/2015	MD	0.1	MD/ME discuss sending email to opt-in deponents
10/29/2015	ME	0.2	update plt production tracking spreadsheet to include recently received rog and documents
10/29/2015	ME	0.3	proof read email to plaintiff deponents
10/29/2015	JS	0.2	called re update; asked about mediation-- JS provided update
10/29/2015	ME	0.1	MD/ME discuss sending email to opt-in deponents
10/29/2015	MD	0.2	MD/ME follow up on tasks to be completed post mediation
10/29/2015	MR	0.6	calculate average claim in Jackson email .4, email to team about average Jackson claim .1, follow-up email correcting figures for average claims in Jackson .1
10/29/2015	DG	0.6	md/dg call with plaintiffs' counsel in RSR Maine case 0.6
10/29/2015	DG	0.6	md/dg call with plaintiffs' counsel in RSR Maine case about case strategy 0.6
10/29/2015	JF	0.2	JF/ME review discrepancies in opt-in production data provided by defense counsel
10/29/2015	ME	0.1	telephone call with opt-in for case update
10/29/2015	ME	0.1	telephone call from opt-in for case update
10/29/2015	ME	0.8	send email to 20 opt-ins regarding initial notification of deposition
10/29/2015	ME	1.1	review opt-in production information to understand discrepancies in defendant's and our data
10/29/2015	MD	1	md preparing and outlining tasks to complete to complete litigation 1.0
10/29/2015	ME	0.6	draft email with mediation update to named plaintiffs
10/30/2015	JF	0.1	Mail interrogatory responses for opt-in to sign and mail back to us 0.1
10/30/2015	JF	0.1	Respond to a phone call inquiry regarding Kellogg negotiations 0.1
10/30/2015	ME	0.2	telephone call from opt-in regarding case update .1; notes from conversation .1
10/30/2015	ME	0.1	respond to inquiry from paralegal JF regarding where to direct client phone calls
10/30/2015	ME	0.1	sign letters with interrogatories to review to mail to opt-ins
10/30/2015	ME	0.2	telephone call from intake regarding questions about joining the case .1; notes from conversation .1
10/30/2015	DG	0.1	DG/ME review sending email with mediation update to opt-ins
10/30/2015	ME	1.5	compile documents to prepare for plaintiff depositions
10/30/2015	ME	0.2	reply to email from opt-in regarding deposition

Date	Staff	Amount of Time	Description
10/30/2015	MD	0.2	MD/ME discuss plan for paralegals to complete tasks related to discovery
10/30/2015	AN	0.2	AN/ME post case update to website
10/30/2015	ME	0.2	AN/ME post case update to website
10/30/2015	ME	0.1	MD/ME discuss locating document for subpoena
10/30/2015	MS	0.6	md/dg/ms discussing pros and cons of getting involved in the Maine RSR case in order to protect the Thomas litigation
10/30/2015	MD	0.6	md/dg/ms discussing pros and cons of getting involved in the Maine RSR case in order to protect the Thomas litigation
10/30/2015	ME	0.1	reply to opt-in's email regarding deposition
10/30/2015	MD	0.1	md reviewing notes re potential retaliation concerns from opt-in 0.1
10/30/2015	ME	0.1	DG/ME review sending email with mediation update to opt-ins
10/30/2015	MD	0.1	MD/ME discuss locating document for subpoena
10/30/2015	JF	0.3	Mail interrogatory responses to four (4) opt-ins for their review 0.3
10/30/2015	AN	0.2	ME/AN Review procedure to update website
10/30/2015	MA	0.1	MA/ME discuss approaches to case organization
10/30/2015	MD	0.1	MD/ME discuss how to proceed with addressing opt-in's retaliation concerns
10/30/2015	ME	0.1	reply to email from opt-in regarding deposition
10/30/2015	ME	0.2	JF/ME review mailing interrogatory responses to opt-ins for their review
10/30/2015	ME	0.1	MA/ME discuss approaches to case organization
10/30/2015	ME	0.2	MD/ME discuss plan for paralegals to complete tasks related to discovery
10/30/2015	ME	0.1	reply to email from opt-in regarding deposition
10/30/2015	ME	0.2	review notice list and client database to determine if we have any prior information from intake
10/30/2015	ME	0.1	MD/ME discuss how to proceed with addressing opt-in's retaliation concerns
10/30/2015	JF	0.2	JF/ME review mailing interrogatory responses to opt-ins for their review
10/30/2015	DG	0.6	md/dg/ms discussing pros and cons of getting involved in the Maine RSR case in order to protect the Thomas litigation
10/30/2015	ME	0.4	verify accuracy of interrogatory responses from handwritten questions results to prepare to mail interrogatory to client for review
10/30/2015	ME	0.1	reply to opt-in's email regarding deposition
10/30/2015	ME	0.1	reply to email from opt-in regarding case update
10/30/2015	ME	0.1	reply to email from opt-in regarding case update
10/30/2015	ME	0.1	reply to opt-in's email regarding deposition
10/30/2015	ME	0.2	ME/AN Review procedure to update website
10/30/2015	MR	0.5	begin process of downloading (archiving) emails from plaintiff using Mailstore archive software .4, email to para ME about this .1
10/30/2015	MR	0.6	continue to nurse archive process, dealing with frequent timing out or errors .6.
10/31/2015	MR	0.2	perform email processing step 3: move from outlook id into separate pst
10/31/2015	MR	0.1	examine emails from plaintiff
10/31/2015	MR	0.2	perform email process step 2, i.e. import into Outlook .2
11/2/2015	KIM	2.9	Review Kellogg materials for deposition digest
11/2/2015	ME	0.4	MD/JP/ME meet to review process for redacting attorney-client privilege information from client documents before producing to defense counsel
11/2/2015	AD	1.6	Composed deposition Digest 1.6
11/2/2015	DG	0.1	review email to classmates re unsuccessful mediation .1
11/2/2015	MD	0.6	MS, MD, KW, AD meet to discuss Kellogg deposition digests.
11/2/2015	ME	1	JP/ME meeting to review tasks needed to complete discovery
11/2/2015	ME	0.2	MD/ME discuss handling telephone calls from intakes who inquire about joining the case

Date	Staff	Amount of Time	Description
11/2/2015	MS	0.6	MS, MD, KW, AD meet to discuss Kellogg deposition digests.
11/2/2015	ME	0.1	MD/ME assign tracking attorney availability for defending plaintiff depositions
11/2/2015	JP	0.1	JP/ME review process for denoting deceased clients in database
11/2/2015	ME	0.6	JP/ME review status of client documents to be produced to defense counsel
11/2/2015	MD	0.2	MD/ME discuss handling telephone calls from intakes who inquire about joining the case
11/2/2015	ME	0.1	JP/ME review process for denoting deceased clients in database
11/2/2015	ME	0.7	review discrepancies between our data and defense counsel's data regarding plaintiff production
11/2/2015	MD	0.4	MD/JP/ME meet to review process for redacting attorney-client privilege information from client documents before producing to defense counsel
11/2/2015	JP	0.4	MD/JP/ME meet to review process for redacting attorney-client privilege information from client documents before producing to defense counsel
11/2/2015	MR	0.3	copy plaintiff's converted emails (into a pst) over to external hard drive for transfer to office server .2, email to ME about status of plaintiff's emails .1
11/2/2015	ME	0.4	track attorney availability for defending plaintiff depositions
11/2/2015	MD	0.2	md collect dates of unavailability for depositions of opt-ins from other attorneys 0.2
11/2/2015	ME	0.2	mail closing letter/returned consent to sue to intake
11/2/2015	MD	0.1	MD/ME assign tracking attorney availability for defending plaintiff depositions
11/2/2015	KIM	0.6	MS, MD, KW, AD meet to discuss Kellogg deposition digests.
11/2/2015	AD	0.6	MS, MD, KW, AD meet to discuss Kellogg deposition digests.
11/2/2015	JP	0.6	JP/ME review status of client documents to be produced to defense counsel
11/2/2015	MD	0.1	md email counsel in Maine case about information needed to enter into agreement 0.1
11/2/2015	ME	0.5	update tracking spreadsheet to include plaintiff availability for depositions
11/2/2015	JP	1	JP/ME meeting to review tasks needed to complete discovery
11/2/2015	JP	0.1	JP/ME discuss workload
11/2/2015	ME	0.1	review notes from telephone conversation with opt-in last week to verify if return call is necessary
11/2/2015	ME	0.2	telephone call from intake regarding questions about joining the case
11/2/2015	MD	0.2	md write email to new attorneys for review of case and to prepare for depositions 0.2
11/2/2015	ME	0.1	AG/ME discuss missed call from opt-in
11/2/2015	AD	1.4	Analyzed Mediation Statement to prepare for drafting deposition Digest 1.4
11/2/2015	AG	0.1	AG/ME discuss missed call from opt-in
11/2/2015	ME	0.1	enter intake contact information into database and notes from conversation
11/2/2015	ME	0.1	JP/ME discuss workload
11/3/2015	JP	0.9	create chart to show information we have on 20 new deponents regarding interrogatory & production of, documents provided and produced or needed
11/3/2015	ME	0.1	JP/ME discuss delegating task to verify receipt of documents produced by defense counsel
11/3/2015	JP	2.1	respond to emails from clients with questions regarding mediation update
11/3/2015	ME	0.6	prepare interrogatories to produce to defense counsel .6
11/3/2015	MD	0.2	md review documents produced by opt-in for production to Kellogg 0.2
11/3/2015	ME	0.2	prepare for meeting to review process of tracking received documents from defense counsel with JF
11/3/2015	JF	0.2	JF/ME review process for verifying that we have received requested discovery documents from defense counsel

Date	Staff	Amount of Time	Description
11/3/2015	JP	0.7	call plt to determine availability for depositions and explained deposition process
11/3/2015	JF	4.3	Verify that we have received requested discovery documents from defense counsel 4.3
11/3/2015	MD	0.1	md respond to ms about Kellogg's mediation statement 0.1
11/3/2015	ME	2.9	prepare opt-ins' documents for production to defense counsel
11/3/2015	MS	0.5	review mediation statement for background on case
11/3/2015	MD	0.4	md review damage calculations for potential settlement with Kellogg 0.4
11/3/2015	MS	0.2	review McCartt case for background
11/3/2015	JP	0.1	JP/ME discuss delegating task to verify receipt of documents produced by defense counsel
11/3/2015	KIM	3.5	Compose deposition digest.
11/3/2015	MD	1	md call with defense counsel re settlement and discovery 1.0
11/3/2015	KIM	0.5	Compose deposition digest.
11/3/2015	MS	0.3	review Kellogg mediation statement
11/3/2015	AD	2.5	Compose Deposition Digest 2.5
11/3/2015	ME	0.2	JF/ME review process for verifying that we have received requested discovery documents from defense counsel
11/3/2015	ME	0.2	update plaintiff's availability for deposition in tracking spreadsheet
11/3/2015	KIM	1.9	Compose deposition digest.
11/3/2015	AD	0.4	Composed deposition Digest .4
11/3/2015	KIM	1.3	Compose deposition digest.
11/3/2015	MD	0.3	MD/ME review information needed for response to def's motion to compel discovery and dismiss those who haven't responded
11/3/2015	ME	0.3	MD/ME review information needed for response to def's motion to compel discovery and dismiss those who haven't responded
11/4/2015	KIM	0.6	Compose deposition digest.
11/4/2015	JF	3.4	Verify that we have received requested discovery documents from defense counsel 3.4
11/4/2015	KIM	0.5	Compose deposition digest.
11/4/2015	JP	0.4	called to discuss deposition schedule and process
11/4/2015	ME	0.1	MD/ME review location of opt-in payroll history
11/4/2015	JP	2.2	assemble documents and case info on plt deponents
11/4/2015	JP	0.3	called to discuss deposition availability and what happens in a deposition
11/4/2015	KIM	0.5	Compose deposition digest.
11/4/2015	ME	0.1	update tracking spreadsheet for opt-in interrogatory production
11/4/2015	AD	2.1	Compose deposition digest 2.1
11/4/2015	MD	0.4	dg/md meet to review materials we need to send to Ed for his and our preparation of SJ briefing .3; call to Ed re same .1
11/4/2015	JP	0.9	called and discussed deposition and fears of retaliation
11/4/2015	AD	1	Continued to Draft deposition digest 1.0
11/4/2015	JF	2.6	Verify that we have received requested discovery documents from defense counsel 2.6
11/4/2015	DG	0.7	dg/md meet to review materials we need to send to Ed for his and our preparation of SJ briefing .3; call to Ed re same .1; email to ET re SJ documents/exhibits/plan for remaining discovery .3
11/4/2015	ME	0.2	JF/ME review opt-in documents that were produced by defense counsel to verify which opt-ins we have received documents for

Date	Staff	Amount of Time	Description
11/4/2015	ME	0.2	review plt 1st request for production to better understand the format in which documents were produced by defense counsel in order to complete task of verifying receipt of documents for all opt-ins
11/4/2015	KIM	0.5	Compose deposition digest.
11/4/2015	ME	1.8	prepare opt-ins' documents for production to defense counsel
11/4/2015	ME	0.1	review draft of subpoena
11/4/2015	MD	0.4	md call with defense counsel about completing discovery 0.4
11/4/2015	JP	0.6	called to discuss availability for deposition and explained deposition process
11/4/2015	ME	1.3	prepare opt-in's documents for production to defense counsel
11/4/2015	KIM	0.8	MD/DG/JP/AD/KIM/ME review/report updates regarding plan for completing litigation
11/4/2015	AD	0.8	MD/DG/JP/AD/KIM/ME review/report updates regarding plan for completing litigation
11/4/2015	MD	0.8	MD/DG/JP/AD/KIM/ME review/report updates regarding plan for completing litigation
11/4/2015	DG	0.8	MD/DG/JP/AD/KIM/ME review/report updates regarding plan for completing litigation
11/4/2015	JP	0.8	MD/DG/JP/AD/KIM/ME review/report updates regarding plan for completing litigation
11/4/2015	ME	0.8	MD/DG/JP/AD/KIM/ME review/report updates regarding plan for completing litigation
11/4/2015	AD	0.6	Continued to draft deposition Digest .6
11/4/2015	MD	0.2	md/dg discussing deadlines for expert discovery 0.2
11/4/2015	ME	0.1	MD/ME review process for verifying opt-in documents received by defense counsel
11/4/2015	DG	0.2	md/dg discussing deadlines for expert discovery 0.2
11/4/2015	KIM	0.4	Compose deposition digest.
11/4/2015	KIM	0.7	Compose deposition digest.
11/4/2015	MD	0.1	MD/ME review process for verifying opt-in documents received by defense counsel
11/4/2015	JF	0.2	JF/ME review opt-in documents that were produced by defense counsel to verify which opt-ins we have received documents for
11/5/2015	AD	1.1	Compose deposition digest 1.1
11/5/2015	KIM	1.5	Review outside sales exempt. materials for deposition digest.
11/5/2015	AD	2.2	Composed deposition digest 2.2
11/5/2015	ME	3.9	prepare opt-ins' documents for production to defense counsel
11/5/2015	KIM	0.8	Review Kellogg deposition for digest.
11/5/2015	KIM	0.7	Compose deposition digest.
11/5/2015	MR	2.2	perform analysis on three past cases regarding average recovery per plaintiff (with separate opt-in, arbitration and passive class status analysis) 2.0, email to atty MD regarding this analysis .2
11/5/2015	AD	1.2	Composed deposition digest 1.2
11/5/2015	KIM	0.9	Review deposition for deposition digest.
11/5/2015	KIM	0.9	Review Christopher case for Kellogg.
11/5/2015	AD	1.5	Composed deposition digest 1.5
11/5/2015	KIM	0.3	Compose deposition digest.
11/5/2015	KIM	0.4	Compose deposition digest.
11/5/2015	JK	0.5	JK organize files on database
11/5/2015	MR	0.1	follow-up email to atty MD about average plaintiff recovery analysis

Date	Staff	Amount of Time	Description
11/5/2015	JF	2.8	Verify that we have received requested discovery documents from defense counsel 2.8
11/5/2015	KIM	0.4	Compose deposition digest.
11/5/2015	ME	0.1	telephone call to intake regarding joining the case
11/5/2015	JF	3.6	Verify that we have received requested discovery documents from defense counsel 3.6
11/6/2015	KIM	1	Compose deposition digest 1.0.
11/6/2015	JP	0.2	md/jp discuss selecting new opt-ins for depositions 0.2
11/6/2015	MD	0.2	md/ms discuss exchange of expert report deadlines as proposed by Kellogg 0.2
11/6/2015	ME	0.1	telephone call from opt-in regarding retaliation concerns
11/6/2015	CLER	2.9	create PDF format of documents recd from client
11/6/2015	ME	2.8	compile information for subpoena
11/6/2015	KIM	0.5	Compose deposition digest 0.5.
11/6/2015	KIM	0.4	Compose deposition digest 0.4.
11/6/2015	AD	3.2	Composed deposition digest 3.2
11/6/2015	AD	0.2	Compose deposition digest .2
11/6/2015	MD	0.5	md review documents for selection of opt-ins for depositions 0.5
11/6/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#323 - JOINT STATUS REPORT signed by all parties estimated Trial Days: 20 days. (Nelson, James)
11/6/2015	MD	0.2	md/jp discuss selecting new opt-ins for depositions 0.2
11/6/2015	MD	0.1	MD/ME discuss locating documents needed to review opt-in's retaliation concern
11/6/2015	ME	0.1	MD/ME discuss locating documents needed to review opt-in's retaliation concern
11/6/2015	MD	0.5	exchange emails and review joint stipulation with Kellogg's counsel 0.5
11/6/2015	ME	0.2	MA/ME set up index for searching opt-in emails
11/6/2015	ME	0.2	MD/ME review information needed for subpoena
11/6/2015	MD	1	md call with client about participating in deposition and addressing concerns about retaliation 1.0
11/6/2015	MA	0.2	MA/ME set up index for searching opt-in emails
11/6/2015	MS	0.4	md/ms discussing deposition process, case staffing issues, and how to expeditiously complete discovery
11/6/2015	ME	0.1	telephone call from opt-in re retaliation concerns
11/6/2015	KIM	0.4	Compose deposition digest 0.4.
11/6/2015	MS	0.2	md/ms discuss exchange of expert report deadlines as proposed by Kellogg 0.2
11/6/2015	ME	0.1	left vm for opt-in
11/6/2015	KIM	0.9	Compose deposition digest 0.9.
11/6/2015	MD	0.1	MD/ME discuss documents received from plt
11/6/2015	ME	0.1	MD/ME discuss documents received from plt
11/6/2015	ME	2.5	prepare opt-ins' documents for production to defense counsel
11/6/2015	MD	0.4	md/ms discussing deposition process, case staffing issues, and how to expeditiously complete discovery
11/6/2015	AD	2.5	Composed deposition digest 2.5
11/6/2015	KIM	1.5	Compose deposition digest 1.5.
11/6/2015	MD	0.5	md call with client about being deposed and addressing retaliation concerns 0.5
11/6/2015	MD	0.3	md call with client about retaliation concerns 0.3
11/6/2015	MD	0.2	MD/ME review information needed for subpoena
11/6/2015	MD	0.5	md reviewing client documents concerning retaliation concerns 0.5



Date	Staff	Amount of Time	Description
11/6/2015	MD	0.3	md call with defense counsel about scheduling order 0.3
11/9/2015	AD	3.1	Completed deposition digest 3.1
11/9/2015	MR	0.3	JP/MR Kellogg Rogs discussion about processed rogs .1, tracking rogs .1, incomplete and possible duplicate SM responses .1
11/9/2015	ME	2.1	compile information for subpoena
11/9/2015	KIM	0.8	Compose deposition digest, 0.8.
11/9/2015			Process new set of rogs: matchup ids and names .7, identify new SM responses .6, reconcile names .4, format Rog Merge template .4, format new SM results excel sheet for new data .4, examine previously create rogs .2, configure Merge process .2, test process rogs .2, repeated tweaks and process rogs .4, spot check rogs .3, email to paras about processed rogs .1
	MR	3.9	
11/9/2015	KIM	0.8	Compose deposition digest, 0.8.
11/9/2015	KIM	1	Compose deposition digest, 1.0.
11/9/2015	KIM	0.3	Compose deposition digest, 0.3.
11/9/2015	MD	0.2	confer about status of opt-ins who have not confirmed depositions 0.2
11/9/2015	JP	0.2	confer about status of opt-ins who have not confirmed depositions 0.2
11/9/2015	MD	0.1	call client about deposition 0.1
11/9/2015	MD	0.1	MD/MR confer on problem of accessing closed cases for research into per plaintiff award amounts .1
11/9/2015	CM	0.1	call from spouse of client with new phone number (.1)
11/9/2015	ME	0.1	reply to opt-in's email regarding deposition availability
11/9/2015	MD	0.4	planning deposition schedule 0.4
11/9/2015	MR	0.3	create list of incomplete SM3 responses .2, email to paras .1
11/9/2015	ME	0.5	review opt-in's documents to prepare for production to defense counsel
11/9/2015	JP	0.3	JP/MR Kellogg Rogs discussion about processed rogs .1, tracking rogs .1, incomplete and possible duplicate SM responses .1
11/9/2015	MR	0.1	MD/MR confer on problem of accessing closed cases for research into per plaintiff award amounts .1
11/9/2015	MR	0.1	assist MD in accessing closed cases for research into per plaintiff award amounts .1
11/10/2015	JP	0.5	md/jp discussing process for opt-in depositions and follow up to clients for discovery responses 0.5
11/10/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
11/10/2015	MD	3.5	md review opt-in locations, availability, attorney availability and create schedule for depositions 3.5
11/10/2015	MD	0.5	md/jp discussing process for opt-in depositions and follow up to clients for discovery responses 0.5
11/10/2015	MD	0.1	md call to client about deposition 0.1
11/10/2015	MS	0.3	review ad deposition digest
11/10/2015	MD	1	draft interview template and incorporate questions from questionnaire about hours to prepare clients for depositions 1.0
11/10/2015	MS	0.1	drafting questions from deposition digesting
11/10/2015	MS	0.2	review and confirm deposition defense scheduling
11/10/2015	MD	0.3	md review and edit co-counseling agreement 0.3
11/10/2015	DG	0.6	dg/jp discuss deposition prep process for 20 new plaintiffs .3; review client questions form for deposition prep .3
11/10/2015	MD	0.3	md review Kellogg motion to compel documents 0.3
11/10/2015	JP	0.3	dg/jp discuss deposition prep process for 20 new plaintiffs .3
11/10/2015	MD	0.1	md email in-house team regarding deposition schedule 0.1
11/11/2015	MD	0.1	ms/md discuss AD digest and scheduling of depositions

Date	Staff	Amount of Time	Description
11/12/2015	ME	0.1	MR/ME discuss issues with defendant's ESI production
11/12/2015	JP	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	MD	0.2	MD/MR confer on phone about defendant not having produced any supervisor or management emails .2
11/12/2015	AN	0.1	Compose email to opt-in to verify new contact information
11/12/2015	ME	0.3	copy documents produced by defense counsel today into respective deponent files
11/12/2015	AN	0.1	Compose email to verify new contact information
11/12/2015	JP	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	AN	0.1	Compose email to opt-in to verify new address and telephone number
11/12/2015	JP	1.5	review design spreadsheet for preparing information to be included in response to def's motion to compel discovery responses
11/12/2015	AN	0.1	Compose email to opt-in to verify updated contact information based on response to questions
11/12/2015	ME	0.5	download and save documents produced by defense counsel
11/12/2015	MS	0.1	ms/md discuss AD digest and scheduling of depos
11/12/2015	DG	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	MS	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	ME	1.5	review design spreadsheet for preparing information to be included in response to def's motion to compel discovery responses
11/12/2015	MR	0.3	review prior email discussion about Defendant email production not in pst format .2, email to atty MD about issue of email production .1
11/12/2015	MD	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	AD	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	JS	1.1	set up deposition scheduling spreadsheet from existing opt-in plt information; format by time period and location
11/12/2015	KIM	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	AN	0.1	Compose email to opt-in to verify new contact information
11/12/2015	AN	0.2	Telephone call (0.1) and compose email (0.1) to verify contact information
11/12/2015	JS	0.4	convert pdf docket entry to xls; format accordingly
11/12/2015	MS	0.1	md/ms conferring about call with ET in order to plan for summary judgment briefing 0.1
11/12/2015	MD	0.1	md/ms discussing testimony to elicit from clients during depositions 0.1
11/12/2015	MR	0.5	MR/ME review emails produced by defense counsel to locate index of manager's emails
11/12/2015	MR	0.2	prep email files on external drive for para ME .2

Date	Staff	Amount of Time	Description
11/12/2015	AN	0.1	Compose email to opt-in to verify new contact information
11/12/2015	AN	0.1	Compose email to opt-in to verify new contact information listed as response to questions
11/12/2015	AN	0.1	Compose email to opt-in regarding changes in address and phone number
11/12/2015	AN	0.1	Telephone call to opt-in to verify correct phone number
11/12/2015	MS	0.1	md/ms discussing testimony to elicit from clients during depositions 0.1
11/12/2015	ME	0.1	listen to voicemail from opt-in regarding deposition
11/12/2015	ME	0.2	MD/ME review emails produced by defense counsel to determine what information is still needed
11/12/2015	MR	0.2	MD/MR confer on phone about defendant not having produced any supervisor or management emails .2
11/12/2015	MD	0.2	MD/ME review emails produced by defense counsel to determine what information is still needed
11/12/2015	AN	0.1	Compose email to opt-in to verify new contact information
11/12/2015	MR	0.1	MR/ME discuss issues with defendant's ESI production
11/12/2015	ME	0.1	print agenda for meeting
11/12/2015	MD	1.5	MD/JP/JS(in part)/ME finalize deposition scheduling process and review assigned tasks .9; review information needed for response to motion to compel .6
11/12/2015	AN	4.1	Update client information based on responses to recent online questions regarding hours worked for Kellogg
11/12/2015	AN	0.1	Compose email to opt-in to verify new contact information listed as response to questions
11/12/2015	JS	0.6	team (DG/MS/MD/AD/KW/JP/JS) meet to discuss plt depositions; logistics and scheduling, locations, deponent preparation process, documents and materials needed, and next steps.
11/12/2015	JP	1.5	MD/JP/JS(in part)/ME finalize deposition scheduling process and review assigned tasks .9; review information needed for response to motion to compel .6
11/12/2015	JS	0.9	js meet with jp/me/md re: deposition scheduling and logistics
11/12/2015	AN	0.1	Compose email to opt-in to verify change in contact information based on questions response
11/12/2015	KIM	0.5	Review deposition video sent to clients to learn what they know about depos. 0.5.
11/12/2015	MD	0.2	md/dg confer about arguments to make in opposition Kellogg's motion to compel 0.2
11/12/2015	KIM	1	Review discovery responses against requests, 1.0.
11/12/2015	ME	1.5	MD/JP/JS(in part)/ME finalize deposition scheduling process and review assigned tasks .9; review information needed for response to motion to compel .6
11/12/2015	ME	0.5	MR/ME review emails produced by defense counsel to locate index of manager's emails
11/12/2015	JS	0.4	draft sample language for email with link to deposition prep video
11/12/2015	ME	0.1	schedule time for team meeting
11/12/2015	ME	0.2	compile documents produced by defense counsel for back up plaintiff deponents
11/12/2015	AN	0.1	Compose email to opt-in to verify new contact information
11/12/2015	AN	0.1	Compose email to verify change in telephone number
11/12/2015	AN	0.2	Telephone call (0.1) and compose email (0.1) to opt-in to verify new phone number

Date	Staff	Amount of Time	Description
11/12/2015	MD	0.1	md/ms conferring about call with ET in order to plan for summary judgment briefing 0.1
11/12/2015	DG	0.2	md/dg confer about arguments to make in opposition Kellogg's motion to compel 0.2
11/12/2015	JS	1.7	upload deposition preparation video to google drive for Kellogg, draft provisional email sample for opt-ins to receive with link to video
11/12/2015	ME	0.1	update team list of tasks to complete
11/13/2015	AN	0.1	Update client information in response to email from client
11/13/2015	AN	0.1	Update client information in response to email from client
11/13/2015	JP	0.3	JP/JF Review of the process of document assembly for depositions 0.3
11/13/2015	AN	0.1	Update client information based on response to email from client
11/13/2015	MS	0.3	md/ms discussing deposition dates and analysis needed to prepare clients for depositions 0.3
11/13/2015	MS	0.4	review O/S issues in recent case law and prior briefing to facilitate prep outline
11/13/2015	JF	1.6	Assembly of documents for depositions 1.6
11/13/2015	MD	0.3	md/ms discussing deposition dates and analysis needed to prepare clients for depositions 0.3
11/13/2015	AN	0.1	update client contact information based on email response from client
11/13/2015	MS	1.8	review AD deposition digest compared to transcript for issues
11/13/2015	MR	0.6	read email from JP about opt-in who worked in Snacks but damages do not reflect this .1, check damage calcs .1, check original data received from Kellogg .1, send detailed email to JP with charts of Kellogg's payroll data and payroll history records on this opt-in showing why our damage calcs show him with MF dates and no Snacks dates .3
11/13/2015	JF	0.3	JP/JF Review of the process of document assembly for depositions 0.3
11/13/2015	JS	1.2	research flights for possible deposition scheduling
11/13/2015	AN	0.1	Update client information in response to email from client
11/13/2015	JS	2.6	rework deposition tracking spreadsheet based on deponent location; create new spreadsheet based on reassigned dates provided to deft. reconcile atty schedules with travel logistics
11/13/2015	AN	0.1	Update client contact information in response to email from opt-in
11/13/2015	MD	2.5	drafting reply to motion to compel 2.5
11/13/2015	DG	0.4	draft deposition prep materials for clients' next round of depositions .4
11/13/2015	MD	0.3	md reviewing documents produced by opt-in .3
11/13/2015	AN	0.1	Update client information based on response to email from client
11/16/2015	JF	2	Track information for response to defendant's motion to compel plaintiff discovery responses 2.0
11/16/2015	MS	1.2	review Thomas digest and commentary
11/16/2015	ME	2	JP/ME review status of plaintiff interrogatory response, address any issues, and prepare for production to defense counsel
11/16/2015	MS	0.2	collect and send docs to ET for O/S Argument
11/16/2015	KIM	0.4	Kellogg deposition scheduling review, 0.4.
11/16/2015	ME	0.3	JP/JF/ME review process for tracking information for response to defendant's motion to compel plaintiff discovery responses
11/16/2015	AD	0.9	Revise client deposition digest. .9
11/16/2015	ME	0.2	JF/ME review how to save notes in client database for deposition preparation into client folder
11/16/2015	ME	1.9	prepare opt-in's documents for production to defense counsel
11/16/2015	JS	0.8	burn deposition prep videos to DVD for plt deposition prep
11/16/2015	JF	1.9	Document assembly for depositions 1.9

Date	Staff	Amount of Time	Description
11/16/2015	ME	0.5	organize client documents to prepare for paralegal meeting regarding status/tasks to complete for discovery
11/16/2015	AD	2.7	Revised the deposition digest. 2.7
11/16/2015	JF	2.5	Document assembly for depositions 2.5
11/16/2015	MD	4.5	md drafting opposition to Kellogg's motion to compel 4.5
11/16/2015	MD	0.3	MD/ME review information needed for subpoena
11/16/2015	MD	0.2	md/ms discussing criteria to lay out for deposition defense in order to prepare for depositions 0.2
11/16/2015	CLER	0.4	organize documents recently produced to defense counsel .3; track documents in spreadsheet .1
11/16/2015	AD	0.7	ms/ad review deposition digest and discuss litigation issues for tagging
11/16/2015	ME	1	compile information for subpoena
11/16/2015	JP	2	JP/ME review status of plaintiff interrogatory response, address any issues, and prepare for production to defense counsel
11/16/2015	CLER	0.1	verify client's name on consent to sue
11/16/2015	JS	0.2	update deposition scheduling spreadsheet
11/16/2015	MS	0.2	md/ms discussing criteria to lay out for deposition defense in order to prepare for depositions 0.2
11/16/2015	MS	0.7	ms/ad review deposition digest and discuss litigation issues for tagging
11/16/2015	MD	0.2	md/ms discussing how to best organize materials to send to of counsel for summary judgment briefing 0.2
11/16/2015	JP	0.3	JP/JF/ME review process for tracking information for response to defendant's motion to compel plaintiff discovery responses
11/16/2015	ME	0.3	MD/ME review information needed for subpoena
11/16/2015	JF	0.3	JP/JF/ME review process for tracking information for response to defendant's motion to compel plaintiff discovery responses
11/16/2015	JP	0.2	JP/ME discuss tasks to complete for discovery
11/16/2015	MS	0.2	details for deposition defense
11/16/2015	AD	2.3	Revise client deposition digest 2.3
11/16/2015	MS	0.2	md/ms discussing how to best organize materials to send to of counsel for summary judgment briefing 0.2
11/16/2015	ME	0.1	JF/ME discuss location of letters sent to client regarding answers to interrogatories
11/16/2015	MS	0.2	md/ms discussing how to best organize materials to send to of counsel 0.2
11/16/2015	JF	0.2	JF/ME review how to save notes in client database for deposition preparation into client folder
11/16/2015	ME	0.2	JP/ME discuss tasks to complete for discovery
11/16/2015	JF	0.1	JF/ME discuss location of letters sent to client regarding answers to interrogatories
11/17/2015	ME	1.4	prepare plt documents to produce to defense counsel
11/17/2015	MD	0.5	JP/MD/ME determine priority of tasks to complete for discovery
11/17/2015	JP	0.5	JP/MD/ME determine priority of tasks to complete for discovery
11/17/2015	MD	0.1	email defense counsel about depositions of opt-ins 0.1
11/17/2015	JF	0.4	JF/ME review task for verifying cause of discrepancies in data to prepare information for response to defendant's motion to compel plaintiff's discovery responses
11/17/2015	ME	0.7	JP/ME determine task needed to complete for response to defendant's motion to compel discovery responses .4; review plaintiff's documents to prepare for producing to defense counsel .3
11/17/2015	JS	0.2	call re deposition scheduling

Date	Staff	Amount of Time	Description
11/17/2015	CLER	0.2	prepare FedEx label (mailing of discovery documents)
11/17/2015	AN	0.1	Update client contact information in response to email from client with changes
11/17/2015	AD	1.1	Revise client deposition digest 1.1
11/17/2015	ME	0.1	MD/ME discuss status of compiled information for subpoena
11/17/2015	MD	0.1	md draft text to send to clients about discovery responses 0.1
11/17/2015	CLER	0.2	prepare FedEx label (mailing of discovery documents)
11/17/2015	ME	0.1	left voicemail for opt-in regarding answer to interrogatory
11/17/2015	ME	0.3	JF/ME verify location of opt-in's discovery responses
11/17/2015	JF	0.1	Call from client; confirmation he did the questions and sent it to us. 0.1
11/17/2015	MD	2	md drafting response to Kellogg's motion to compel 2.0
11/17/2015	ME	0.3	JP/ME discuss opt-in discovery information to review at next team meeting
11/17/2015	JF	0.3	JF/ME verify location of opt-in's discovery responses
11/17/2015			JP/ME determine task needed to complete for response to defendant's motion to compel discovery responses .4; review plaintiff's documents to prepare for producing to defense counsel .3
11/17/2015	JP	0.7	
11/17/2015	MD	0.3	md call with defense counsel about depositions 0.3
11/17/2015	ME	0.4	research discrepancies between defendant's data and plaintiff's data regarding plaintiff discovery responses
11/17/2015	JP	0.3	JP/ME discuss opt-in discovery information to review at next team meeting
11/17/2015	AD	2	Revise client deposition digest 2.0
11/17/2015	MD	0.1	md email defense counsel about opt-in depositions 0.1
11/17/2015	ME	0.2	save plaintiff's documents produced to defense counsel in client folders
11/17/2015	ME	0.1	ME/JF Review of Tracking info for response to defendant's motion 0.1
11/17/2015	JS	1.8	burn DVDs of deposition preparation videos for plt deposition preparation
11/17/2015	JF	1.2	Track information for response to defendant's motion to compel plaintiff discovery responses 1.2
11/17/2015	ME	0.2	JF/ME review progress of tracking spreadsheet for response to defendant's motion to compel discovery responses
11/17/2015	ME	0.4	JF/ME review task for verifying cause of discrepancies in data to prepare information for response to defendant's motion to compel plaintiff's discovery responses
11/17/2015	JF	0.2	JF/ME review progress of tracking spreadsheet for response to defendant's motion to compel discovery responses
11/17/2015	ME	0.5	JP/MD/ME determine priority of tasks to complete for discovery
11/17/2015	ME	0.1	returned call to opt-in, left voicemail
11/17/2015	AN	0.1	Compose email to opt-in to verify new telephone number
11/17/2015	AN	0.1	Exchange email regarding correct zip code for client's home address
11/17/2015	JS	0.6	research flights for MS/AD for ATL deposition defense
11/17/2015	JS	0.5	book hotel for MS/AD for ATL deposition defense
11/17/2015	AN	0.1	Compost email to opt-in to verify new mailing address
11/17/2015	AN	0.1	Update client information based on email with new phone number
11/17/2015	JF	1.2	Track information for response to defendant's motion to compel plaintiff discovery responses 1.2
11/18/2015	ME	0.4	prepare answer to interrogatories for opt-in to review
11/18/2015	JF	0.7	Track information for response to defendant's motion to compel plaintiff discovery responses 0.7
11/18/2015	AN	0.1	Compose email to opt-in to verify mailing address
11/18/2015	ME	0.3	telephone call from opt-in to clarify questions responses for answer to interrogatories .2; notes from conversation .1



Date	Staff	Amount of Time	Description
11/18/2015	MS	0.4	MS/JF Meet to book flight for Kellogg [client] deposition 0.4
11/18/2015	ME	0.1	telephone call from opt-in for case update
11/18/2015	JF	0.3	Send confirmation email with flight information to MS/AD 0.3
11/18/2015	ME	1.7	prepare answer to interrogatories to mail to opt-in plaintiffs for review before producing to defense counsel
11/18/2015	ME	0.4	review status of plaintiff discovery production
11/18/2015	AN	0.1	Compose email to opt-in to verify new telephone number listed on questions response
11/18/2015	ME	0.4	telephone call with opt-in regarding answer to interrogatories
11/18/2015	AN	0.1	Respond to opt-in email regarding new telephone number
11/18/2015	AN	0.1	Exchange email with opt-in to verify mailing address
11/18/2015	MD	0.2	coordinate travel arrangements with JF about deposition of client 0.2
11/18/2015	JF	0.4	MS/JF Meet to book flight for Kellogg Crowell deposition 0.4
11/18/2015	MD	0.3	MD/JF Review the task of arranging attorney flight itineraries for Kellogg depositions ([client],[client]) 0.3
11/18/2015	JP	0.2	ms/jp discuss process for deposition preps
11/18/2015	JF	0.8	Book flight for [client] deposition for MD and KW 0.8
11/18/2015	ME	0.1	read new emails in inbox
11/18/2015	MD	0.1	md call to client about deposition 0.1
11/18/2015	MS	0.2	ms/jp discuss process for deposition preps
11/18/2015	JF	1.4	Perform Volk deposition flight itinerary research 1.4
11/18/2015	AN	0.1	Respond to email from opt-in verifying new telephone number.
11/18/2015	JF	0.3	MD/JF Review the task of arranging attorney flight itineraries for Kellogg depositions ([client],[client]) 0.3
11/18/2015	ME	0.4	compare opt-in list provided by defense counsel to excluded opt-in list to prepare information for response to defendant's motion to compel
11/18/2015	ME	0.3	prepare opt-in's documents for production to defense counsel
11/18/2015	ME	1.4	compile information for subpoena
11/18/2015	AN	0.5	Update spreadsheet tracking opt-in contact information listed as response in recent questions regarding hours worked at Kellogg
11/19/2015	MD	0.2	md email defense counsel about email production 0.2
11/19/2015	MD	3	md editing opposition brief to Kellogg's motion to compel 3.0
11/19/2015	JF	1.6	Track information for response to defendant's motion to compel plaintiff discovery responses 1.6
11/19/2015	AN	0.1	Respond to email regarding change of address for opt-in
11/19/2015	MD	0.3	review documents to produce 0.3
11/19/2015	MD	0.3	provide response to ME about production of documents and rogs 0.3
11/19/2015	JP	0.1	js/jp discuss case status and case load
11/19/2015	JS	0.1	js/jp discuss case status and case load
11/19/2015	MD	0.2	MD/ME review information needed for response to defendant's motion to compel
11/19/2015	ME	5.1	compile information for response to defendant's motion to compel plaintiff's discovery responses
11/19/2015	ME	0.2	MD/ME review information needed for response to defendant's motion to compel
11/20/2015	AN	0.1	AN/JF Review the client filter function for Kellogg tracking 0.1
11/20/2015	JP	0.2	JP/JF Meet to discuss AIM texting task 0.2
11/20/2015	ME	0.4	JP/ME determine plan to continue obtaining and producing plaintiff's discovery response
11/20/2015	JF	0.1	AN/JF Review the client filter function for Kellogg tracking 0.1

Date	Staff	Amount of Time	Description
11/20/2015	DG	2	edit to motion to compel 1.7; legal research re same .3
11/20/2015	JF	0.2	ME/JF Review the Kellogg tracking spreadsheet for the purposes of AIM texting 0.2
11/20/2015	CLER	0.2	organize documents produced by defense counsel
11/20/2015	ME	0.6	JP/ME delegate tasks to complete for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	MD	1	md edit brief and file via ECF 1
11/20/2015	JP	0.4	JP/ME determine plan to continue obtaining and producing plaintiff's discovery response
11/20/2015	ME	1	prepare exhibits for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	ME	0.8	finalize data for response to defendant's motion to compel discovery responses
11/20/2015	ME	1.4	update exhibit for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	JS	0.5	research hotel options for opt-in deposition in FL
11/20/2015	ME	0.5	proof read declaration for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	JP	0.6	JP/ME delegate tasks to complete for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	ME	0.2	ME/JF Review the Kellogg tracking spreadsheet for the purposes of AIM texting 0.2
11/20/2015	ME	0.5	proof read brief for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	AN	0.1	Exchange email with opt-in to verify new mailing address listed as response to hours questions
11/20/2015	AN	0.1	JF/AN Review use of AIM online texting program to send reminder texts to clients to answer questions
11/20/2015	JS	1.8	Table of Authorities/Table of Contents for plt opp to def mot to compel
11/20/2015	MD	0.2	MD/ME review data compiled for response to defendant's motion to compel discovery responses
11/20/2015	JF	0.2	JP/JF Meet to discuss AIM texting task for Kellogg claimants 0.2
11/20/2015	MD	0.2	MD/ME review exhibit for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	AN	0.2	Telephone call with opt-in in response to text regarding questions responses
11/20/2015	ME	0.2	MD/ME review data compiled for response to defendant's motion to compel discovery responses
11/20/2015	ME	0.2	prepare documents for production to defense counsel
11/20/2015	ME	0.2	MD/ME review exhibit for response to defendant's motion to compel plaintiff's discovery responses
11/20/2015	JF	2.8	AIM text the claimants in the Kellogg case in order to elicit Kellogg questions responses 2.8
11/20/2015	ME	0.1	telephone call from opt-in regarding answer to interrogatories
11/20/2015	ME	0.6	prepare information regarding defendant's production for response to defendant's motion to compel plaintiff discovery responses
11/20/2015	MD	0.1	MD/ME review information regarding defendant production needed for response to defendant's motion to compel discovery responses
11/20/2015	ME	0.1	MD/ME review information regarding defendant production needed for response to defendant's motion to compel discovery responses

Date	Staff	Amount of Time	Description
11/20/2015	MD	4	md editing opposition brief to Kellogg's motion to compel, reviewing documents, and drafting declaration in opposition 4.0
11/20/2015	ME	0.3	email questions link for answer to interrogatories to opt-ins
11/20/2015	JS	1.3	format brief in opp to def mot to compel
11/20/2015	ME	0.1	telephone call with opt-in regarding answer to interrogatories
11/23/2015	MD	0.2	review documents produced by defense counsel to prepare subpoena
11/23/2015	ME	0.1	listen to voicemail from opt-in regarding questions for answer to interrogatories
11/23/2015	MD	0.1	email defense counsel about naming a replacement deponent 0.1
11/23/2015	ME	0.1	email questions for answer to interrogatories to opt-in
11/23/2015	JS	0.4	research travel for plt deposition in FL
11/23/2015	ME	0.1	save documents provided by opt-in
11/23/2015	JS	0.4	create day sheet for opt-in deposition
11/23/2015	JS	0.4	create day sheet for opt in deposition
11/23/2015	MR	0.2	MR/ME determine issue with opt-in's digital document
11/23/2015	JS	0.4	draft day sheet for opt-in deposition defense
11/23/2015	AD	0.6	Reviewed Kellogg Deposition defense outline. .6
11/23/2015			Transfer documents recd from ECF system to docket file and create file copy (Docket#324 - RESPONSE, by Plaintiff Patty Thomas, to [318] MOTION for Discovery to Compel Responses. (Attachments: # (1) Declaration, # (2) Exhibit, # (3) Exhibit)(Dunn, Matt)
	CLER	0.1	
11/23/2015	ME	0.2	MR/ME determine issue with opt-in's digital document
11/23/2015	ME	0.2	save documents provided by opt-in
11/23/2015	MD	0.5	editing deposition prep outline 0.5
11/23/2015	ME	0.1	JP/ME review status of new questions responses for answer to interrogatories and discuss plan for processing them
11/23/2015	ME	0.1	download/save documents produced by defense counsel
11/23/2015	ME	0.3	finalize compiling information for subpoena
11/23/2015	JF	0.1	Check on Kellogg AIM text response 0.1
11/23/2015	MS	0.6	review [client] discovery production in preparation for depo
11/23/2015	JP	0.1	JP/ME review status of new questions responses for answer to interrogatories and discuss plan for processing them
11/23/2015	MS	0	email list of docs to be printed for deposition defense
11/23/2015	JF	0.2	Update of contact information for claimant 0.2
11/23/2015	MS	0.4	review deposition outline in preparation for [client] depo
11/23/2015	JS	0.4	book hotel for attys for FL deposition defense
11/23/2015	JS	0.1	save deposition notices for three opt-ins
11/23/2015	JS	0.2	call to confirm deposition date and prep date with opt-in
11/23/2015	ME	0.1	MD/ME review opt-in's general retaliation concerns
11/23/2015	ME	0.9	troubleshoot issue with opt-in's digital document
11/23/2015	ME	0.2	review documents produced by defense counsel to prepare subpoena
11/23/2015	MD	0.1	md/ms discussing topics to cover in deposition prep of clients and documents to review 0.1
11/23/2015	MD	2.5	md research stores clients work at for issuing subpoena for videos 2.5
11/23/2015	MS	0.1	md/ms discussing topics to cover in deposition prep of clients and documents to review 0.1
11/23/2015	ME	0.2	prepare opt-in's documents for production to defense counsel
11/23/2015	MD	0.4	MD/ME review information that has been compiled for subpoena
11/23/2015	ME	0.4	MD/ME review information that has been compiled for subpoena

Date	Staff	Amount of Time	Description
11/23/2015	ME	0.1	telephone call to opt-in regarding completing questions for answer to interrogatories
11/23/2015	ME	0.6	MD/JP/ME review tasks needed to complete for plaintiff depositions scheduled in the next few weeks
11/23/2015	MD	0.1	MD/ME review opt-in's general retaliation concerns
11/23/2015	ME	0.2	update plaintiff discovery tracking spreadsheet to include most recently completed questions for answers to interrogatories
11/23/2015	MD	0.6	MD/JP/ME review tasks needed to complete for plaintiff depositions scheduled in the next few weeks
11/23/2015	JP	0.6	MD/JP/ME review tasks needed to complete for plaintiff depositions scheduled in the next few weeks
11/24/2015	JS	0.2	cancel hotel reservation
11/24/2015	ME	0.3	MR/ME determine damage calculation document to resend to defense counsel per their request
11/24/2015	ME	0.2	MD/ME review issue with documents produced to defense counsel
11/24/2015	MD	3.5	md preparing list of stores to send subpoenas to for discovery of opt-ins 3.5
11/24/2015	AD	0.8	Reviewed Plaintiff's client file docs for [client] deposition. .8
11/24/2015	JS	0.1	eml link to deposition prep video to deponent
11/24/2015	MD	0.2	MD/ME review issue with documents produced to defense counsel
11/24/2015	ME	0.2	update subpoena spreadsheet to include information from most recent defendant production
11/24/2015	MR	0.3	MR/ME determine damage calculation document to resend to defense counsel per their request
11/24/2015	MD	0.5	research address of companies for subpoenas 0.5
11/24/2015	ME	0.4	prepare answer to interrogatories and damage calculations to resend to defense counsel per their request
11/24/2015	JS	0.4	revise deposition tracking sheet with new information and substitutes
11/24/2015	ME	0.6	add store addresses to subpoenas
11/24/2015	DG	0.2	edit explanation of depos letter to plaintiffs who will be deposed .2
11/24/2015	AN	0.1	Respond to email from opt-in regarding new phone number
11/24/2015	ME	0.3	proof read letter to deponents regarding what to expect at their deposition
11/24/2015	KIM	1.3	Review deposition prep materials for deposition defense on 12/3.
11/24/2015	ME	0.1	review most recent draft of letter to deponents
11/24/2015	ME	0.8	prepare opt-in's documents to resend to defense counsel per defense counsel's request
11/24/2015	ME	0.2	review subpoena to be sent to defense counsel
11/24/2015	MD	0.2	MD/ME discuss documents to resend to defense counsel per their request
11/24/2015	AD	0.9	Reviewed defense counsels document materials for Crowell deposition. .9
11/24/2015	ME	0.1	save recently documents recently produced by defense counsel in deponents' files
11/24/2015	ME	0.2	MD/ME discuss documents to resend to defense counsel per their request
11/24/2015	ME	0.1	email link to deponent's document to MS
11/24/2015	MS	0.1	MS/ME discuss document preparation needed for plaintiff deposition
11/24/2015	ME	0.1	MS/ME discuss document preparation needed for plaintiff deposition
11/24/2015	JS	0.2	send deposition prep link to deponent
11/25/2015	JF	0.1	JP/JF Question about response tracking via AIM (text message function) 0.1
11/25/2015	ME	0.2	email sample of defendant documents to MS for deposition preparation
11/25/2015	MS	0.3	md/ms/jp discuss documents needed from opt-in for deposition 0.3
11/25/2015	JP	0.1	JLP/JF Question about response tracking via AIM (text message function) 0.1
11/25/2015	ME	2.7	prepare opt-in's documents for production to defense counsel

Date	Staff	Amount of Time	Description
11/25/2015	MS	0.3	md/ms/jp discuss documents needed from opt-in for deposition 0.3
11/25/2015	ME	0.4	MD/ME review documents sent by opt-ins to prepare for producing to defense counsel
11/25/2015	JP	0.3	md/ms/jp discuss documents needed from opt-in for deposition 0.3
11/25/2015	MS	0.1	MS/AD/ME discuss status of plaintiff's document production to prepare for deposition
11/25/2015	AD	0.1	MS/AD/ME discuss status of plaintiff's document production to prepare for deposition
11/25/2015	ME	0.1	discuss status of plaintiff's document production to prepare for deposition
11/25/2015	MD	0.5	md review documents for clients to produce in response to Kellogg's discovery demands 0.5
11/25/2015	ME	0.1	MS/AD/ME discuss status of plaintiff's document production to prepare for deposition
11/25/2015	MD	0.5	reviewing documents needed for opt-ins deposition 0.5
11/25/2015	MS	0.8	review and collect docs for deposition defense in Atlanta
11/25/2015	ME	0.1	left voicemail for opt-in regarding deposition
11/25/2015	MD	0.3	md/ms/jp discuss documents needed from opt-in for deposition 0.3
11/25/2015	MD	0.4	MD/ME review documents sent by opt-ins to prepare for producing to defense counsel
11/25/2015	CLER	0.1	create PDF format of CTS recd.
11/25/2015	CLER	0.1	Data Entry of contact information
11/25/2015	ME	0.1	save electronic deposition notices for opt-in plaintiffs
11/25/2015	MD	0.2	corresponding via email with defense counsel about deposition start time and replacement deponent 0.2
11/25/2015	ME	0.5	print documents for plaintiff's deposition preparation
11/25/2015	MD	0.5	reviewing documents for ms to take with him for deposition of opt-in 0.5
11/25/2015	JP	0.1	discuss status of plaintiff's document production to prepare for deposition
11/25/2015	MD	0.2	review clients interrogatory responses 0.2
11/25/2015	MD	0.1	md/jp discussing follow up with client about documents/interrogatory response in preparation for deposition 0.1
11/25/2015	ME	0.3	telephone call to opt-in regarding document .2; notes from conversation .1
11/25/2015	MD	0.2	signing and reviewing subpoenas for discovery to various chain stores 0.2
11/25/2015	ME	0.3	send emails to opt-ins to notify them of deposition time change
11/25/2015	AG	1.1	prepare service of subpoenas by USPS certified mail return receipt
11/25/2015	AD	0.9	MS/AD Discussed deposition preparation strategy for plaintiff Crowell .9
11/25/2015	MS	0.9	MS/AD Discussed deposition preparation strategy for plaintiff Crowell .9
11/25/2015	ME	0.1	telephone call to opt-in regarding signature for answer to interrogatory
11/25/2015	ME	0.3	verify that all answer to interrogatories responses have been saved in deponents' files
11/25/2015	MD	0.4	researching method of serving subpoena 0.4
11/25/2015	ME	0.3	produce opt-in documents to defense counsel
11/30/2015	ME	0.4	telephone call with opt-in to clarify questions about her documents .3; notes from conversation .1
11/30/2015	ME	0.1	download and save documents produced by defense counsel
11/30/2015	MS	2.7	ms/ad prep client for deposition, including review of docs
11/30/2015	ME	0.4	save opt-in's documents sent by opt-in via email
11/30/2015	ME	0.1	email documents produced by defense counsel to litigation team
11/30/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
11/30/2015	AD	5	ms/ad travel NP-Atlanta

Date	Staff	Amount of Time	Description
11/30/2015	ME	0.1	MD/ME discuss documents produced by defense counsel for plaintiff's deposition
11/30/2015	ME	0.1	left voicemail for opt-in regarding questions about documents
11/30/2015	ME	0.7	prepare opt-in's documents for production to defense counsel
11/30/2015	MD	0.1	MD/ME discuss documents produced by defense counsel for plaintiff's deposition
11/30/2015	AD	2.7	ms/ad prep client for deposition, including review of docs
11/30/2015	JS	0.2	eml with deposition and prep details
11/30/2015	ME	0.2	search hard copies of transcripts to determine if we have transcripts for a particular deponent
11/30/2015	MS	1.5	review and annotate late discovery docs for [client] depo
11/30/2015	MS	0.2	ms/md discuss [client] deposition defense
11/30/2015	MS	5	ms/ad travel NP-Atlanta
11/30/2015	ME	0.4	telephone call with opt-in for case update and to discuss documents needed for discovery .3; notes from conversation .1
11/30/2015	MD	0.1	MD/ME discuss location of information regarding defendant depositions that have been taken
11/30/2015	MD	0.2	ms/md discuss doc production process for plaintiff deponents
11/30/2015	MD	0.1	ms/md discuss doc production process for plaintiff deponents
11/30/2015	MD	0.2	ms/md discuss [client] deposition defense
11/30/2015	ME	0.5	review documents produced by defense counsel for deponent
11/30/2015	MS	0.1	ms/md discuss doc production process for plaintiff deponents
11/30/2015	JF	0.1	Record the conversation with [client] regarding the deposition in claimant's Notes 0.1
11/30/2015	ME	0.2	review documents sent by opt-in for discovery
11/30/2015	ME	1.2	update plaintiff discovery responses tracking spreadsheet to include types of responsive documents opt-in has
11/30/2015	ME	0.1	MD/ME discuss location of information regarding defendant depositions that have been taken
11/30/2015	JS	0.1	eml to opt-in re deposition preparation plans, provide hotel and contact information
11/30/2015	CLER	1.5	prepare opt-in's documents to produce to defense counsel 1.3; send documents to defense counsel .1; track/organize documents produced to defense counsel .1
11/30/2015	ME	0.2	set up account to receive defendant's discovery production
11/30/2015	JS	0.1	update day sheet with current hotel info, etc.
11/30/2015	ME	0.4	file opt-ins' documents to location on server indicating they have been produced .3; record produced documents in tracking spreadsheet .1
11/30/2015	JS	0.1	update day sheet and tracking spreadsheet with new information re: depo
12/1/2015	MR	0.5	JK/MR prep laptop for atty MD for upcoming Volk depo
12/1/2015	ME	0.2	draft answer to interrogatory for opt-in based on opt-in's questions responses
12/1/2015	JK	0.5	JK/MR prep laptop for atty MD for upcoming [client] depo
12/1/2015	MR	0.3	JK/MR discuss items from Central meeting involving CAMP order
12/1/2015	ME	0.8	prepare hard copies of documents for attorneys to prepare opt-in for deposition
12/1/2015	JK	0.5	JK/MR prep laptop for atty MD for upcoming [client] depo
12/1/2015	ME	0.1	MD/ME review documents sent by opt-in who will be deposed to determine which should be produced to defense counsel and printed to prepare opt-in for deposition
12/1/2015	JK	0.3	JK/MR discuss items from Central meeting involving CAMP order



Date	Staff	Amount of Time	Description
12/1/2015	JS	0.4	update spreadsheet with master list
12/1/2015	ME	0.4	print additional copies of documents for plaintiff deposition
12/1/2015	MD	0.5	md review documents for [client] deposition 0.5
12/1/2015	MD	0.1	md/dg discussing follow up with experts concerning case 0.1
12/1/2015	JS	0.3	send all deponents email re: depo
12/1/2015	MD	0.1	MD/ME review documents sent by opt-in who will be deposed to determine which should be produced to defense counsel and printed to prepare opt-in for deposition
12/1/2015	MR	0.1	JP/MA/MR discuss follow-up needed after meeting regarding Central CAMP
12/1/2015	JK	0.3	JK/MR discuss items from Central meeting involving CAMP order
12/1/2015	ME	0.3	discuss additional documents needed to print for plaintiff deposition
12/1/2015	JP	0.1	JP/MA/MR discuss follow-up needed after meeting regarding Central CAMP
12/1/2015	MA	0.1	JP/MA/MR discuss follow-up needed after meeting regarding Central CAMP
12/1/2015	MD	0.5	md reserve hotel/vehicle for [client] deposition 0.5 (clerical)
12/1/2015	MD	0.3	discuss additional documents needed to print for plaintiff deposition
12/1/2015	JP	0.3	md/jp discuss deposition scheduling status and follow up with clients re depositions 0.3
12/1/2015	MD	0.4	MD/KW discuss prep for deposition on 12/3.
12/1/2015	MD	0.2	md send revised schedule to defense counsel regarding depositions 0.2
12/1/2015	MD	0.3	md/jp discuss deposition scheduling status and follow up with clients re depositions 0.3
12/1/2015	JP	0.8	JP/ME review tasks needed to complete for discovery
12/1/2015	ME	0.1	download opt-ins' questions responses to prepare drafts of their answers to interrogatories
12/1/2015	ME	0.5	resend previously produced documents to defense counsel per their request
12/1/2015	ME	0.8	JP/ME review tasks needed to complete for discovery
12/1/2015	CLER	0.3	create PDF format of documents recd from client
12/1/2015	MS	6	ms/ad travel Atl-NP
12/1/2015	AD	6	ms/ad travel Atl-NP
12/1/2015	AD	0.4	ms/ad post deposition client meeting
12/1/2015	DG	0.1	md/dg discussing follow up with experts concerning case 0.1
12/1/2015	MS	1	ms/ad meet w/ client pre deposition for further prep
12/1/2015	CLER	0.2	create PDF format of document recd from client (discovery documents)
12/1/2015	JS	0.1	JS/ME verify that plaintiff has received information regarding location of deposition
12/1/2015	MS	0.4	ms/ad post deposition client meeting
12/1/2015	ME	0.5	prepare opt-in's documents for production to defense counsel to ensure all documents are received before opt-in's deposition
12/1/2015	KIM	0.4	MD/KW discuss prep for deposition on 12/3.
12/1/2015	MS	6	ms/ad defend client depo
12/1/2015	AD	6	ms/ad defend client depo
12/1/2015	ME	1	review emails defendant's produced for opt-in deponent to determine if any are needed for deposition preparation
12/1/2015	AD	1	ms/ad meet w/ client pre deposition for further prep
12/1/2015	ME	0.1	JS/ME verify that plaintiff has received information regarding location of deposition
12/2/2015	JP	0.2	JP/ME determine tasks needed to obtain remaining discovery from opt-ins
12/2/2015	AN	0.2	Telephone call from opposing counsel regarding rescheduling deposition for next week
12/2/2015	ME	0.1	send text to opt-in to contact our office regarding question about documents

Date	Staff	Amount of Time	Description
12/2/2015	ME	1.5	draft answer to interrogatory responses for opt-ins based on opt-ins' questions responses
12/2/2015	ME	0.1	resend defendant produced documents for plaintiff deposition to attorney defending the deposition
12/2/2015	JF	0.2	JF/ME discuss calling opt-ins to obtain documents they indicated they had in their interrogatory responses
12/2/2015	DG	0.2	dg/jp discuss class definition and TM-CA issue .2
12/2/2015	MS	0.2	dg/ms discuss class definition and TM-CA issue .2
12/2/2015	JP	0.2	dg/jp discuss class definition and TM-CA issue .2
12/2/2015	KIM	1	travel from deposition prep to hotel/lodging 1.0
12/2/2015	MD	3	prepare client for deposition 3.0
12/2/2015	DG	0.4	dg/ms discuss class definition and TM-CA issue .2; locate prior emails on subject and forward to MS .2
12/2/2015	ME	0.3	review documents produced by defense counsel for plaintiff's deposition
12/2/2015	ME	0.2	compare exhibit from defendant's reply to plaintiff's motion to compel discovery responses and dismiss nonresponders to our data
12/2/2015	AN	1.5	Update client information in database based on responses to questions regarding hours worked
12/2/2015	JS	0.1	update deposition spreadsheet with new information (possible cancellation by deft)
12/2/2015	ME	0.2	JP/ME determine tasks needed to obtain remaining discovery from opt-ins
12/2/2015	JP	0.4	t conf w/ JP re [client] deposition and deposition process
12/2/2015	ME	0.2	read defendant's reply to plaintiff's response to defendant's motion to compel discovery responses and dismiss nonresponders
12/2/2015	ME	0.2	JF/ME discuss calling opt-ins to obtain documents they indicated they had in their interrogatory responses
12/2/2015	JS	0.1	determine flight plan for attys and ETA
12/2/2015	AD	0.1	Drafted email to Kellogg paralegals regarding exhibit materials for crowell deposition .1
12/2/2015	ME	0.1	download production sent by defendant for deponent
12/2/2015	MS	0.4	t conf w/ JP re [client] deposition and deposition process
12/2/2015	ME	1.2	prepare opt-in documents for production to defense counsel
12/2/2015	JP	0.1	JP/ME discuss following up with opt-in regarding questions response for answer to interrogatories
12/2/2015	KIM	9.4	travel to Sarasota for opt-in [client] deposition
12/2/2015	AN	0.1	Compose email to opt-in to verify email address as listed as response to questions about hours worked for Kellogg
12/2/2015	ME	0.5	prepare list of opt-ins to call regarding document production for discovery
12/2/2015	MD	9.4	travel to Sarasota for opt-in [client] deposition
12/2/2015	KIM	3	prepare client for deposition 3.0
12/2/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#325 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, Kellogg USA Inc, TO RESPONSE to [318] MOTION for Discovery to Compel Responses (Attachments: # (1) Exhibit A)(Nelson, James)
12/2/2015	ME	1	compare defendant's data attached in exhibit for defendant's reply to plaintiff's response to defendant's motion to compel discovery to our data
12/2/2015	AD	3	Compiled notes from crowell deposition into word doc 3.0
12/2/2015	CLER	0.3	prepare FedEx label to send to opt-in to use to mail documents to our office
12/2/2015	MD	0.6	debrief [client] deposition in prep for tomorrow's deposition defense
12/2/2015	MS	0.6	debrief [client] deposition in prep for tomorrow's deposition defense

Date	Staff	Amount of Time	Description
12/2/2015	ME	0.1	JP/ME discuss following up with opt-in regarding questions response for answer to interrogatories
12/2/2015	AD	0.1	Drafted email to Kellogg team with summary of my notes .1
12/2/2015	MD	1	travel from deposition prep to hotel/lodging 1.0
12/2/2015	AN	0.1	Compose email to opt-in to verify new phone number listed as response to last questions regarding hours worked for Kellogg
12/2/2015	ME	0.1	email documents produced by defense counsel for plaintiff's deposition to attorney defending the deposition
12/3/2015	KIM	0.5	prep client before deposition 0.5
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	ME	0.1	left voicemail for opt-in regarding completing questions for answer to interrogatories
12/3/2015	JP	0.3	JP/ME discuss process for following up with opt-in's about incomplete questions responses
12/3/2015	ME	0.1	send email to opt-in with link to questions for answer to interrogatories
12/3/2015	MR	0.3	JP/MR examine plaintiff document with motus/crs pings .
12/3/2015	CLER	0.2	prepare FedEx label for opt-in to use to send documents to our office
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	KIM	6.9	defend deposition of opt-in Volk (include 45 minute lunch speaking about deposition)
12/3/2015	ME	0.7	prepare opt-in documents for production to defense counsel for discovery purposes
12/3/2015	MD	0.5	prep client before deposition 0.5
12/3/2015	JS	0.1	left vm re deposition scheduling
12/3/2015	ME	0.1	email link to questions for answer to interrogatories to opt-in
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	ME	2	determine reason for any incomplete questions responses for answer to interrogatory so opt-in's can be followed up with to complete the questions
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JS	0.4	draft day sheet for depo
12/3/2015	ME	0.1	call opt-in regarding completing questions for answer to interrogatories
12/3/2015	AN	0.2	Telephone call (0.1) and Compose email (0.1) to opt-in regarding documents needed
12/3/2015	MD	6.9	defend deposition of opt-in [client] (include 45 minute lunch speaking about deposition)
12/3/2015	JP	0.3	JP/MR examine plaintiff document with motus/crs pings .
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JS	0.4	followup email with deponent re: deposition scheduling and logistics
12/3/2015	ME	0.1	left voicemail to opt-in regarding completing questions for answers to interrogatories
12/3/2015	ME	0.1	left voicemail for opt-in regarding completing questions for answer to interrogatories
12/3/2015	JF	0.3	Contact opt-ins who have not yet sent their responsive documents 0.3
12/3/2015	JF	0.4	Contact opt-ins who have not yet sent their responsive documents 0.4
12/3/2015	JF	0.1	Contact opt-ins who have not yet sent their responsive documents 0.1
12/3/2015	ME	0.2	JP/ME/MR review Defendant production with motus/crs pings
12/3/2015	ME	0.1	send email to opt-in with link to questions for answer to interrogatories
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JP	0.2	JP/ME/MR review Defendant production with motus/crs pings
12/3/2015	JS	0.2	call with plt re depo scheduling and confirmation of dates and times

Date	Staff	Amount of Time	Description
12/3/2015	MD	7	travel to new paltz from Sarasota, FL from Volk deposition
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JS	0.3	book hotel for atty and deponent for deposition
12/3/2015	MR	0.2	JP/ME/MR review Defendant production with motus/crs pings
12/3/2015	KIM	7	travel to new paltz from Sarasota, FL from Volk deposition
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JS	0.3	book hotel for atty and deponent for deposition
12/3/2015	ME	0.2	telephone call with opt-in about documents for discovery production .1; notes from conversation .1
12/3/2015	ME	0.1	left voicemail for opt-in regarding completing [ ] answers to interrogatories
12/3/2015	JS	0.4	draft day sheet for depo
12/3/2015	ME	0.1	talk to opt-in regarding completing [ ] answer to interrogatories
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JS	0.4	followup email with deponent re: depo scheduling and logistics
12/3/2015	ME	0.1	send email to opt-in [ ] for answer to interrogatories
12/3/2015	ME	0.1	email to opt-in [ ]for answer to interrogatories
12/3/2015	AN	0.2	Telephone call (0.1) to opt-in and compose email (0.1) regarding documents needed
12/3/2015	AN	0.2	Telephone call (0.1) and compose email (0.1) to opt-in regarding documents needed
12/3/2015	MS	0.3	ms/jp discuss review of email production for PA depositions
12/3/2015	ME	0.2	telephone call from opt-in regarding sending responsive documents for discovery
12/3/2015	ME	0.4	JF/ME meet to review process for contacting opt-ins who have not yet sent their responsive documents
12/3/2015	ME	0.1	send email to opt-in [ ] for answer to interrogatories
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	AD	0.1	ad/jlp discussed kellogg crowell deposition questioning .1
12/3/2015	ME	0.2	telephone call with opt-in regarding sending documents responsive to interrogatories
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JP	0.3	ms/jp discuss review of email production for PA depositions
12/3/2015	MS	0.2	ms/js discuss coordination of PA depositions
12/3/2015	ME	0.1	email opt-in [ ] for answer to interrogatories
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JS	0.2	ms/js discuss coordination of PA depositions
12/3/2015	JF	0.3	Contact opt-ins who have not yet sent their responsive documents 0.3
12/3/2015	ME	0.3	speak with opt-in regarding completing [ ] answers to interrogatories
12/3/2015	MS	0.4	review and address details for PA depositions
12/3/2015	AN	0.2	Telephone call (0.1) and compose email (0.1) to opt-in regarding documents needed
12/3/2015	JS	0.2	call to deponent re: logistics and to confirm depo time and date
12/3/2015	ME	0.3	JP/ME discuss process for following up with opt-in's about incomplete [interrogatory] responses
12/3/2015	ME	0.1	email answer to interrogatory for opt-in to review before producing to defense counsel
12/3/2015	ME	0.1	email answer to interrogatory to opt-in to review before producing to defense counsel

Date	Staff	Amount of Time	Description
12/3/2015	JP	0.1	ad/jlp discussed kellogg [client] deposition questioning .1
12/3/2015	ME	0.1	left voicemail for opt-in regarding completing [ ] answers to interrogatories
12/3/2015	AN	0.2	Telephone call (0.1) and Compose email (0.1) to opt-in regarding documents
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	ME	0.1	send email to opt-in [ ] for answer to interrogatories
12/3/2015	ME	0.2	JS/ME review tracking spreadsheet for plaintiff deposition scheduling
12/3/2015	JF	0.3	Contact opt-ins who have not yet sent their responsive documents 0.3
12/3/2015	JS	0.2	JS/ME review tracking spreadsheet for plaintiff deposition scheduling
12/3/2015	ME	0.2	JS/ME discuss document preparation for plaintiff depositions
12/3/2015	JF	0.3	Contact opt-ins who have not yet sent their responsive documents 0.3
12/3/2015	ME	0.4	compare our data regarding opt-ins who have not produced interrogatory responses to defedant's data
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	ME	0.2	MR/ME review process for updating index of opt-in emails produced by defense counsel
12/3/2015	MR	0.6	update dtsearch index for opt-in emails produced by Defendant .6
12/3/2015	JS	0.2	JS/ME discuss document preparation for plaintiff depositions
12/3/2015	AN	0.1	Telephone call from opt-in regarding documents
12/3/2015	ME	0.3	save emails produced by defense counsel for deponent
12/3/2015	ME	0.1	send email to opt-in regarding completing [questions] for answer to interrogatories
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	MR	0.2	MR/ME review process for updating index of opt-in emails produced by defense counsel
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/3/2015	JF	0.4	JF/ME meet to review process for contacting opt-ins who have not yet sent their responsive documents
12/3/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/4/2015	CLER	0.2	create PDF format of documents recd from client
12/4/2015	JF	0.3	Contact opt-in who have not yet sent their responsive documents 0.3
12/4/2015	AN	0.1	Compose email to opt-in regarding documents
12/4/2015	JF	0.3	Contact opt-in who have not yet sent their responsive documents 0.3
12/4/2015	JF	0.3	Contact opt-in who have not yet sent their responsive documents 0.3
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	AN	0.1	Telephone call to opt-in regarding clarification of contact information
12/4/2015	AN	0.2	Telephone call (0.1) and compose email (0.1) to plaintiff regarding documents needed
12/4/2015	JF	0.2	Call from claimant regarding documents 0.2
12/4/2015	AN	0.2	Telephone call (0.1) and Compose Email (0.1) to plaintiff regarding documents
12/4/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Create Fedex label for claimant to mail documents to us 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.1	Email opt-in who has not yet sent his responsive documents 0.1
12/4/2015	JS	0.2	perform internet search for social media postings
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	AN	0.1	Telephone call to opt-in to verify email address

Date	Staff	Amount of Time	Description
12/4/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/4/2015	JS	0.3	perform internet search for social media postings
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	AN	0.2	Telephone call with opt-in to discuss documents
12/4/2015	JF	0.1	Call from claimant regarding update of contact information 0.1
12/4/2015	JS	0.2	md/js discuss deposition status of opt-ins and potential schedule 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	MD	0.2	md/js discuss deposition status of opt-ins and potential schedule 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.3	Issue saving claimant's email to TM 0.3
12/4/2015	MD	0.1	email defense counsel about opt-in deposition date 0.1
12/4/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Create Fedex label for claimant to mail responsive documents to us 0.2
12/4/2015	MD	0.1	email defense counsel about status of motion for lifting stay 0.1
12/4/2015	MD	0.1	email chain store regarding production of video files 0.1
12/4/2015	MD	0.4	call with opt-in about participating in deposition 0.4
12/4/2015	JF	0.1	Contact opt-ins who have not yet sent their responsive documents 0.1
12/4/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Email opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Email ME about the document response emails from claimants 0.2
12/4/2015	JF	0.3	Contact opt-ins who have not yet sent their responsive documents 0.3
12/4/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/4/2015	AN	0.2	Telephone call (0.1) and Compose Email (0.1) to opt-in regarding needed documents
12/4/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/4/2015	JF	0.2	Call from claimant regarding documents 0.2
12/7/2015	MR	0.2	MR/JF archive email sent to Richard Miller in TM 0.2
12/7/2015	MS	0.8	ms/et discuss issues for Kellogg argument and relevant to depositions
12/7/2015	JF	0.2	Contact opt-in who have not yet sent their responsive documents 0.2
12/7/2015	JS	0.1	eml re depo scheduling issues
12/7/2015	JF	0.2	Call with claimant regarding Kellogg documents in her possession 0.2
12/7/2015	JF	0.4	Contact opt-ins who have not yet sent their responsive documents 0.4
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.1	Email claimant regarding amended document response format 0.1
12/7/2015	JF	0.1	Contact opt-ins who have not yet sent their responsive documents 0.1
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JS	0.1	call from plt asking when atty arrive in PA
12/7/2015	CLER	0.1	Create PDF format of correspondence recd from D. ( CD with PLS and CIS)
12/7/2015	JS	0.1	eml re depo scheduling issues
12/7/2015	JF	0.1	Email ME regarding the process of mailing out document request email 0.1
12/7/2015	JS	0.1	eml re depo planning
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	Email Fedex label for claimant to mail responsive documents to us 0.2
12/7/2015	CLER	0.3	create PDF Format of documents recd from client
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	DG	1	dg/md call with ET re what we need from depositions for our sj motion on OSE 1
12/7/2015	JS	0.1	update day sheet



Date	Staff	Amount of Time	Description
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/7/2015	JS	0.3	change hotel res information
12/7/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/7/2015	JS	0.1	update day sheet
12/7/2015	JS	0.1	print day sheet
12/7/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/7/2015	JS	0.1	print day sheet
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JS	0.5	procure login and pw for GT def download of production, .2; download and save production materials, .3
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/7/2015	MD	1	dg/md call with ET re what we need from depositions for our sj motion on OSE 1
12/7/2015	JS	0.3	dl def production
12/7/2015	MD	0.1	dg/md discuss OSE for depositions .1
12/7/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/7/2015	JF	0.2	Email Fedex label for claimant to mail responsive documents to us 0.2
12/7/2015	DG	0.1	dg/md discuss OSE for depositions .1
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	MR/JF archive email sent to Richard Miller in TM 0.2
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/7/2015	JF	0.7	Process email responses to Kellogg claimants regarding the responsive documents 0.7
12/7/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/8/2015	AN	0.2	Telephone call from plaintiff regarding documents
12/8/2015	JP	0.1	JP/ME review status of document preparation for plaintiff depositions
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	ME	0.1	JP/ME review status of document preparation for plaintiff depositions
12/8/2015	JF	0.1	ME/JF review status of telephone calls to opt-ins requesting documents responsive to answer to interrogatories
12/8/2015	JF	0.4	Respond to emails regarding reception of responsive docs from claimants 0.4
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.1	Meet with David Olsen regarding drop-off of responsive documents 0.1
12/8/2015	ME	0.3	review documents produced by defense counsel
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.1	Follow up with claimant regarding responsive documents via email 0.1
12/8/2015	ME	0.3	download .2; and file electronic documents produced by defense counsel .1
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	ME	0.1	telephone call to opt-in regarding sending documents to our office
12/8/2015	JF	0.3	Phone call with claimant regarding responsive documents 0.3
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Phone call with claimant regarding responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2

Date	Staff	Amount of Time	Description
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	CLER	0.2	create PDF format of documents recd from client (discovery)
12/8/2015	JF	0.2	Email Fedex label to claimant to mail to us his responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Sort individual email responses regarding responsive documents to claimants' TM records
12/8/2015	JF	0.2	0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	ME	0.1	ME/JF review status of telephone calls to opt-ins requesting documents responsive to answer to interrogatories
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.2	Update the Excel spreadsheet with responses from claimants regarding responsive document submission 0.2
12/8/2015	JF	0.2	Phone conversation with claimant regarding responsive documents 0.2
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/8/2015	JF	0.4	Call from claimant regarding responsive documents 0.4
12/8/2015	AN	0.1	Telephone call with attorney regarding contact information
12/8/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	AG	0.3	conduct weekly pacer search of active FLSA cases against Defendants
12/9/2015	JS	0.1	update tracking with info from depo notice
12/9/2015	CLER	0.2	create PDF of documents recd from client (discovery documents)
12/9/2015	JS	0.1	update tracking with info from depo notice
12/9/2015	JS	0.1	update tracking with info from depo notice
12/9/2015	JF	0.1	Email to claimant regarding responsive documents 0.1
12/9/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	JS	0.1	update tracking with info from depo notice
12/9/2015	JF	0.1	Email response to client regarding documents 0.1
12/9/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	JS	0.1	update tracking with info from depo notice
12/9/2015	JS	0.3	draft and send email to deponent re: deposition notice, scheduling, and preparation logistics
12/9/2015	JF	0.2	Email correspondence saved into individual claimants' TM records 0.2
12/9/2015	CLER	0.2	file hard copies of exhibits used in plaintiff's deposition
12/9/2015	JF	0.3	Contact opt-ins who have not yet sent their responsive documents 0.3
12/9/2015	JF	0.1	Spoke with claimant regarding responsive documents 0.1
12/9/2015	JS	0.3	draft and send email to deponent re: deposition notice, scheduling, and preparation logistics
12/9/2015	JS	0.3	draft and send email to deponent re: deposition notice, scheduling, and preparation logistics
12/9/2015	JS	0.3	draft and send email to deponent re: deposition notice, scheduling, and preparation logistics
12/9/2015	ME	0.3	save discovery documents sent by plaintiffs .2; track receipt of documents in spreadsheet .1
12/9/2015	JF	0.2	Email Fedex label to claimant to mail to us his responsive documents 0.2
12/9/2015	CLER	0.2	file hard copies of plaintiffs' discovery documents

Date	Staff	Amount of Time	Description
12/9/2015	JS	0.3	draft and send email to deponent re: deposition notice, scheduling, and preparation logistics
12/9/2015	JS	0.3	draft and send email to deponent re: deposition notice, scheduling, and preparation logistics
12/9/2015	ME	0.3	download [ ] responses for answer to interrogatories .1; prepare [ ] responses to begin drafting answer to interrogatories
12/9/2015	ME	1	prepare plaintiff's documents for production to defense counsel
12/9/2015	ME	0.7	save client emails requesting amended answer to interrogatories .2; document receipt of request in tracking spreadsheet .1; draft amended answers to interrogatories per clients' request .4
12/9/2015	ME	0.3	save deposition notices for plaintiffs who will be deposed in January
12/9/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	ME	0.4	save discovery documents emailed by plaintiffs .3; track receipt of documents in spreadsheet .1
12/9/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	JF	0.1	Email to claimant regarding responsive documents 0.1
12/9/2015	CM	0.2	MR/CM discuss how to keep track of travel costs for depositions (.2)
12/9/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	JF	0.2	Mail Fedex label to claimant to mail to us his responsive documents 0.2
12/9/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	ME	0.1	email paralegal JF about contacting clients via email for discovery information
12/9/2015	JS	0.1	update tracking with info from depo notice
12/9/2015	JF	0.1	Email to claimant regarding responsive documents 0.1
12/9/2015	JF	0.2	Update tracking spreadsheet with new responses from claimant who have not yet sent their responsive documents 0.2
12/9/2015	JF	0.2	Contact opt-ins who have not yet sent their responsive documents 0.2
12/9/2015	JF	0.1	Contact opt-ins who have not yet sent their responsive documents 0.1
12/9/2015	MR	0.2	MR/CM discuss how to keep track of travel costs for depositions (.2)
12/10/2015	ME	0.2	save and track discovery documents received from opt-in
12/10/2015	ME	0.1	send email to opt-in so that opt-in can reply with attached documents responsive to interrogatories
12/10/2015	ME	0.3	draft amended answers to interrogatories for opt-in per opt-ins' request .2; document opt-ins' requests in tracking spreadsheet .1; save request .1
12/10/2015	ME	0.4	telephone call with opt-in to discuss sending documents to our office and case updates .3; notes from conversation .1
12/10/2015	ME	0.3	prepare shipping label for opt-in to use to send discovery documents to our office
12/10/2015	ME	0.2	telephone call from opt-in regarding sending discovery documents to our office and updating contact information
12/10/2015	ME	0.1	draft amended answer to interrogatories for opt-in per opt-in's request
12/10/2015	JS	1.4	research travel logistics for depositions in jan, feb, and mar
12/10/2015	JS	3.4	deposition scheduling for multiple deponents
12/10/2015	ME	0.1	telephone call from opt-in regarding sending documents to our office
12/11/2015	ME	0.3	save opt-ins' discovery documents that were sent via email
12/11/2015	MD	0.4	md/ms discuss md call with Judge Welsh and mediation strategy 0.4
12/11/2015	ME	0.1	download and save documents produced by defense counsel
12/11/2015	MS	0.4	md/ms discuss md call with Judge Welsh and mediation strategy 0.4
12/11/2015	ME	0.2	review discovery documents produced by defense counsel
12/11/2015	ME	0.2	send plaintiff discovery production to defense counsel .1; document production in tracking spreadsheet .1

Date	Staff	Amount of Time	Description
12/11/2015	CLER	0.1	create PDF format of correspondence recd from Publix Super Market attorneys (Objection to Subpoena)
12/11/2015	ME	0.2	prepare opt-ins' answers to interrogatories and amended answers to interrogatories for production to defense counsel
12/11/2015	MS	2	ms/md/jp/mr/jk meet re damages and rational settlement value for Kellogg request to reengage mediation
12/11/2015	ME	0.3	prepare shipping label for opt-in to use to send discovery documents to our office
12/11/2015	MS	0.2	ms/md discuss arb reaction to bracket proposal and strategy for mediation
12/11/2015	ME	0.3	review status of opt-in discovery production
12/11/2015	MD	0.2	ms/md discuss arb reaction to bracket proposal and strategy for mediation
12/11/2015	ME	0.3	telephone call with opt-in about retaliation concerns .2; notes from conversation .1
12/11/2015	JF	0.4	Update tracking spreadsheet with new responses from claimant who have not yet sent their responsive documents 0.4
12/11/2015	ME	2.1	prepare opt-ins' documents for prodction to defense counsel
12/11/2015	ME	0.8	draft answer to interrogatories for opt-ins based on their [ ] responses
12/11/2015	JP	2	ms/md/jp/mr/jk meet re damages and rational settlement value for Kellogg request to reengage mediation
12/11/2015	JK	2	ms/md/jp/mr/jk meet re damages and rational settlement value for Kellogg request to reengage mediation
12/11/2015	MD	2	ms/md/jp/mr/jk meet re damages and rational settlement value for Kellogg request to reengage mediation
12/11/2015	MR	2	ms/md/jp/mr/jk meet re damages and rational settlement value for Kellogg request to reengage mediation
12/14/2015	JS	0.1	left vm re depo scheduling
12/14/2015	CLER	0.1	create PDF format of correpondence recd from Kroger Co. (repsonse to subpoena)
12/14/2015	JF	0.2	Review of emails for claimants' responses to responsive documents 0.2
12/14/2015	JK	2.6	jk review damage calculations .3, calculate the number of days between vacations .6, calculate number of days between any type of paid time off 1.7
12/14/2015	ME	0.1	save and track discovery documents sent via email by opt-ins
12/14/2015	JS	0.4	update spreadsheet with depo details
12/14/2015	ME	0.1	draft amended answer to interrogatories for opt-in per opt-in's request
12/14/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#326 - Stipulated MOTION and [PROPOSED] ORDER by Plaintiff Patty Thomas. (Dunn, Matt) review deposition information to determine total number of depositions taken for billing purposes
12/14/2015	ME	0.2	purposes
12/14/2015	CLER	0.2	create PDF format of documents recd from client (discovery documents) review email sent by excluded opt-in regarding case update .1; verify that opt-in had been sent letter notification about exclusion
12/14/2015	ME	0.2	been sent letter notification about exclusion
12/14/2015	AG	0.1	ECF Filing of Stipulated MOTION and [PROPOSED] ORDER
12/14/2015	CLER	0.1	create PDF format of correpondence recd from Publix SuperMarket ( response to subpoena)
12/14/2015	ME	0.1	draft amended answer to interrogatories for opt-in per opt-in's request
12/14/2015	JP	1	dg/jp/jk/mr/md/ms meeting to make proposal re terms of resurrection of mediatioon 1
12/14/2015	JS	0.2	call with disc rep to discuss depo logistics and planning
12/14/2015	JF	0.1	JF/ME discuss issue with saving client's email to client database

Date	Staff	Amount of Time	Description
12/14/2015	ME	0.2	prepare opt-in's discovery documents for production to defense counsel
12/14/2015	JF	0.1	Respond to Kellogg claimant regarding reception of his responsive documents 0.1
12/14/2015	MD	1	dg/jp/jk/mr/md/ms meeting to make proposal re terms of resurrection of mediation 1
12/14/2015	MR	1	dg/jp/jk/mr/md/ms meeting to make proposal re terms of resurrection of mediation 1
12/14/2015	JK	1	dg/jp/jk/mr/md/ms meeting to make proposal re terms of resurrection of mediation 1
12/14/2015	DG	1	dg/jp/jk/mr/md/ms meeting to make proposal re resurrection of mediation 1
12/14/2015	ME	0.1	JF/ME discuss issue with saving client's email to client database
12/14/2015	ME	0.1	file correspondence regarding objection to plaintiff's subpoena
12/14/2015	MR	0	examine litigation risk and pre-mediation calculations to
12/14/2015	JS	0.3	call with deponent to confirm depo and prep dates
12/14/2015	JS	0.3	call with deponent to dconfirm and discuss logistics
12/14/2015	MS	1	dg/jp/jk/mr/md/ms meeting to make proposal re terms of resurrection of mediation 1
12/14/2015	ME	0.1	email opt-in's answer to interrogatories to opt-in to review before producing to defense counsel
12/14/2015	CLER	0.1	create PDF format of correspondence recd from D. ( Discovery Issues uncovered during depo)
12/14/2015	ME	0.1	email opt-in's answer to interrogatories to opt-in to review before producing to defense counsel
12/14/2015	CLER	0.3	create PDF format of correpondence recd from client (discovery documents)
12/14/2015	ME	0.1	email opt-in's answer to interrogatories to opt-in to review before producing to defense counsel
12/14/2015	ME	0.1	email opt-in's answer to interrogatories to opt-in to review before producing to defense counsel
12/14/2015	ME	0.1	email opt-in's answer to interrogatories to opt-in to review before producing to defense counsel
12/14/2015	MD	0.3	md/ms discuss demand to make to kellogg to continue mediation 0.3
12/14/2015	ME	0.1	read letter from defense counsel regarding discovery issues uncovered during recent depositions
12/14/2015	ME	0.1	save discovery documents faxed by opt-in
12/14/2015	JS	0.1	lef vm for disc rep re depo scheduling
12/14/2015	JS	0.1	left vm with opt-in re depo scheduling
12/14/2015	ME	0.3	prepare opt-ins' answers to interrogatories to send to opt-ins for review
12/14/2015	AG	0.2	conduct weekly pacer search of active FLSA cases against Defendants
12/14/2015	ME	0.2	file opt-ins' documents that were produced to defense counsel last week
12/14/2015	ME	0.1	save opt-in's discovery documents that were received via postal mail
12/14/2015	CLER	0.1	create PDF format of correpondence recd from Price Chopper (response to subpoena)
12/14/2015	MS	1	md/dg/jp/js/ms/mr litigation team meeting to discuss bracket and conditions to propose to mediator to continue mediation with kellogg 1.0
12/14/2015	JP	1	md/dg/jp/js/ms/mr litigation team meeting to discuss bracket and conditions to propose to mediator to continue mediation with kellogg 1.0
12/14/2015	ME	0.1	review stipulated motion and proposed order
12/14/2015	ME	0.1	JP/ME discuss following up with opt-in regarding answer to interrogatories response for more information about possible deponent

Date	Staff	Amount of Time	Description
12/14/2015	JK	1	md/dg/jp/js/ms/mr litigation team meeting to discuss bracket and conditions to propose to mediator to continue mediation with kellogg 1.0
12/14/2015	ME	0.2	send email to opt-in regarding sending discovery documents to our office
12/14/2015	MR	1	md/dg/jp/js/ms/mr litigation team meeting to discuss bracket and conditions to propose to mediator to continue mediation with kellogg 1.0
12/14/2015	MD	1	md/dg/jp/js/ms/mr litigation team meeting to discuss bracket and conditions to propose to mediator to continue mediation with kellogg 1.0
12/14/2015	ME	0.3	prepare opt-ins' discovery documents for production to defense counsel
12/14/2015	MS	0.3	md/ms discuss demand to make to kellogg to continue mediation 0.3
12/14/2015	JP	0.1	JP/ME discuss following up with opt-in regarding answer to interrogatories response for more information about possible deponent
12/15/2015	MR	0.1	read email from MD about case mtg agenda for tomorrow
12/15/2015	MD	0.2	email defense counsel plaintiffs position re mediation 0.2
12/15/2015	MD	0.3	draft agenda for team meeting 0.3
12/15/2015	JS	0.3	draft day sheet for disc rep depo
12/15/2015	JS	0.3	draft day sheet for disc rep depo
12/15/2015	JS	0.3	draft day sheet for disc rep depo
12/15/2015	JS	0.3	draft day sheet for disc rep depo
12/15/2015	JS	0.5	call from disc rep about depo, case update
12/15/2015	ME	0.1	download discovery documents produced by defense counsel
12/15/2015	MD	0.2	read letter from kroger's counsel re discovery 0.2
12/15/2015	JS	0.3	draft day sheet for disc rep depo
12/15/2015	JS	0.1	schedule call with disc rep for depo logistics call
12/15/2015	MS	0.2	md/ms discuss settlement status with defense counsel/mediator 0.2
12/15/2015	CLER	0.1	file documents produced by defense counsel today into deponents' folders
12/15/2015	JS	0.3	draft day sheet for disc rep depo
12/15/2015	JS	0.3	draft day sheet for disc rep depo
12/15/2015	JS	0.2	left vm re depo scheduling
12/15/2015	MD	1	research pending litigation against kellogg and review discovery produced for similar issues in this case 1.0
12/15/2015	MR	0.1	read MD's email sent to Defendant on mediation
12/15/2015	ME	0.4	verify that documents produced by defense counsel have been saved for plaintiffs who will be deposed the first two weeks of January
12/15/2015	MD	0.2	md/ms discuss settlement status with defense counsel/mediator 0.2
12/16/2015	MR	3.7	combine and analyze search term hit list from Defendant 2.0, compare with our ESI protocol search terms 1.5, send detailed email to team .2
12/16/2015	ME	0.1	email MD re following up with client about retaliation concerns
12/16/2015	MD	0.2	review esi search term hit list performed by MR 0.2
12/16/2015	ME	0.1	read order on stipulation re order lifting stay
12/16/2015	ME	1.1	dg/md/jp/mr(in part)/jk(in part)/me team meeting to review response needed to store objections to subpoenas .1; plaintiff deposition update .3; plaintiff discovery production update .2; summarize issue with ESI search terms .1; mediation update .2; post summary judgment plan .2
12/16/2015	MR	0.2	read email from MD about esi protocol and examine materials needed for discussion
12/16/2015	JS	0.2	call with disc rep
12/16/2015	JS	0.1	left vm re depo scheduling



Date	Staff	Amount of Time	Description
12/16/2015	JK	0.1	dg/md/jp/mr(in part)/jk(in part)/me team meeting to review response needed to store objections to subpoenas .1; plaintiff deposition update .3; plaintiff discovery production update .2; summarize issue with ESI search terms .1; mediation update .2; post summary judgment plan .2
12/16/2015	JP	1.1	dg/md/jp/mr(in part)/jk(in part)/me team meeting to review response needed to store objections to subpoenas .1; plaintiff deposition update .3; plaintiff discovery production update .2; summarize issue with ESI search terms .1; mediation update .2; post summary judgment plan .2
12/16/2015	MR	0.1	dg/md/jp/mr(in part)/jk(in part)/me team meeting to review response needed to store objections to subpoenas .1; plaintiff deposition update .3; plaintiff discovery production update .2; summarize issue with ESI search terms .1; mediation update .2; post summary judgment plan .2
12/16/2015	MD	0.5	review documents produced by client 0.5
12/16/2015	DG	1.1	dg/md/jp/mr(in part)/jk(in part)/me team meeting to review response needed to store objections to subpoenas .1; plaintiff deposition update .3; plaintiff discovery production update .2; summarize issue with ESI search terms .1; mediation update .2; post summary judgment plan .2
12/16/2015	MD	1.1	dg/md/jp/mr(in part)/jk(in part)/me team meeting to review response needed to store objections to subpoenas .1; plaintiff deposition update .3; plaintiff discovery production update .2; summarize issue with ESI search terms .1; mediation update .2; post summary judgment plan .2
12/16/2015	MD	0.2	enter various deadlines for completing case 0.2
12/16/2015	MD	0.1	text deponent about deposition 0.1
12/16/2015	MD	0.3	prepare for team meeting 0.3
12/16/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#327 - ORDER on STIPULATION re [326] ORDER LIFTING STAY; Fact Discovery completed by 3/4/2016; Identify Affirmative Experts and Expert Reports (for certification and merits issues only) due by 2/5/16; Identify Rebuttal Expert and Rebuttal Expert Reports due by 3/4/2016; Expert Discovery Deadline (for certification and merits issues) only due by 4/1/16; Summary Judgment motions to be filed by 4/8/16, Oppositions to be filed by 5/6/16, and replies filed by 5/27/16; signed by Judge Ronald B. Leighton. (DN)
12/16/2015	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Noting Date Reset re [311] Plaintiffs' MOTION to Compel Discovery, [318] Defendants' MOTION for Discovery to Compel Responses: Motions reset for 1/8/2016; as directed by Judge Ronald B. Leighton.(DN)
12/16/2015	JP	0.4	js/jp meet to discuss depo scheduling and status report; best practices for calls with discovery reps in order to ensure all aspects of depositions are resolved prior to event
12/16/2015	MD	0.3	speak with client about severance agreement concerns 0.3
12/16/2015	ME	0.1	email link to opt-in's personnel file to MD to review retaliation concerns with opt-in over the phone.
12/16/2015	MR	0.5	compose and send email summarizing considerations about PTO adjustments for damage calculations
12/16/2015	ME	0.1	print meeting agenda for team meeting
12/16/2015	MD	0.3	drafting outline response to kroger's objections to subpoena 0.3
12/16/2015	MS	0.2	discuss experts for damages with litigation team
12/16/2015	JS	0.4	js/jp meet to discuss depo scheduling and status report; best practices for calls with discovery reps in order to ensure all aspects of depositions are resolved prior to event

Date	Staff	Amount of Time	Description
12/16/2015	CLER	0.3	create PDF format of documents recd from client (discovery documents)
12/17/2015	ME	0.2	prepare shipping label for opt-in to use to send discovery documents to our office
12/17/2015	DG	1.6	DG/MD/MR/JP/ME meeting to edit ESI search terms to reduce hits for defense counsel
12/17/2015	MD	0.2	call with client about follow up documents from deposition 0.2
12/17/2015	MR	1.6	DG/MD/MR/JP/ME meeting to edit ESI search terms to reduce hits for defense counsel
12/17/2015	MD	1.6	DG/MD/MR/JP/ME meeting to edit ESI search terms to reduce hits for defense counsel
12/17/2015	JP	1.6	DG/MD/MR/JP/ME meeting to edit ESI search terms to reduce hits for defense counsel
12/17/2015	ME	0.2	mediate and decide on next step
12/17/2015	MS	0.2	md/ms discuss process to involve ET for summary judgment/class cert brief and digesting depositions for ET 0.2
12/17/2015	MD	0.2	review flight schedules and book flight 0.2
12/17/2015	MD	0.2	md/ms discuss process to involve ET for summary judgment/class cert brief and digesting depositions for ET 0.2
12/17/2015	MD	0.5	draft letter to defense counsel about discovery issues 0.5
12/17/2015	JP	0.2	mediate and decide on next step
12/17/2015	MS	0.2	mediate and decide on next step
12/17/2015	MD	0.2	mediate and decide on next step
12/17/2015	MD	1	review opt-ins discovery production 1.0
12/17/2015	DG	0.3	mediate and decide on next step .2; call from Jim Boudreau re same .1
12/17/2015	MD	0.5	draft request for discovery and review clients documents for discovery request 0.5
12/17/2015	MR	0.2	mediate and decide on next step
12/17/2015	JK	0.2	mediate and decide on next step
12/17/2015	ME	0.4	prepare opt-in discovery documents for production to defense counsel
12/17/2015	ME	0.1	save discovery documents sent via email by opt-in
12/17/2015	DG	0.2	call with defense counsel about settlement 0.2
12/17/2015	MD	0.2	call with defense counsel about settlement 0.2
12/17/2015	MD	0.2	write defense counsel concerning offer 0.2
12/17/2015	MD	1.5	research law on subpoenas and draft letter in response to store's objections to subpoenas 1.5
12/17/2015	ME	1.6	DG/MD/MR/JP/ME meeting to edit ESI search terms to reduce hits for defense counsel
12/17/2015	MD	0.3	review and edit ESI search term list 0.3
12/18/2015	MD	0.2	md/ms discuss deposition defense in Seattle and using local counsel for assistance 0.2
12/18/2015	MD	0.5	researching law on concerted activity 0.5

Date	Staff	Amount of Time	Description
12/18/2015	JP	0.5	JP/MR search for intake communication with plaintiff in JP email, KW email, and server
12/18/2015	ME	0.2	verify MD's list of stores who have responded to plt's subpoena
12/18/2015	ME	0.1	request login from company supplying transcripts from plaintiff depositions
12/18/2015	MR	0.3	create revised ESI search term list derived at meeting yesterday
12/18/2015	MS	0.2	md/ms discuss deposition defense in Seattle and using local counsel for assistance 0.2
12/18/2015	MD	1	reviewing discovery for follow up with defense counsel 1
12/18/2015	MR	0.1	read and reply to email from atty DG about revised search term list
12/18/2015	MD	0.1	respond to mr about ESI search terms 0.1
12/18/2015	ME	0.1	save opt-in's document
12/18/2015	DG	0.2	edits to ESI search term proposal to JB .2
12/18/2015	MD	0.1	MD/MR phone conversaton about identifying detail for extrapoliations .1
12/18/2015	ME	0.2	download and save opt-in's deposition trascript
12/18/2015	ME	0.2	email opt-in regarding reviewing his deposition transcript
12/18/2015	ME	0.3	produce opt-ins' discovery documents to defense counsel .2; track production .1
12/18/2015	MR	0.1	read and reply to email from atty MD about ESI search term list
12/18/2015	ME	1.8	prepare deposition notices to defendants
12/18/2015	MR	0.1	MD/MR phone conversaton about identifying detail for extrapoliations .1
12/18/2015	MR	0.1	read MD email about payroll data gaps .1
12/19/2015	MR	1	examine data used to calculate date gaps and extrapolations
12/21/2015	CLER	0.4	create PDF format of documents recd from client (discovery documents)
12/21/2015	CLER	0.2	create PDF format of documents recd from client (discovery documents)
			file hard copies of defendant correspondence re discovery and plaintiff deposition
12/21/2015	CLER	0.3	exhibits
12/21/2015	ME	0.1	save and track opt-in's disocvery documents sent via postal mail
12/21/2015	ME	0.1	save and track opt-in's discovery documents sent via postal mail
12/21/2015	ME	0.2	save discovery documens produced by defense counsel
			review discovery documents produced by defense counsel to determine if there are any
12/21/2015	ME	0.5	gaps in production
12/21/2015	MD	1.5	drafting response to defense counsel about discovery issues 1.5
12/21/2015	MD	0.1	md/jp discuss Kellogg's outstanding discovery production 0.1
12/21/2015	ME	1.5	prepare opt-ins' discovery documents for production to defense counsel
12/21/2015	MD	1.5	drafting letter to defense counsel about missing discovery 1.5
12/21/2015	JS	0.1	update day sheet with travel info
12/21/2015	JP	0.1	md/jp discuss Kellogg's outstanding discovery production 0.1
12/21/2015	JS	0.1	update depo tracking spreadsheet with MD travel info--flights
12/21/2015	MD	0.2	MD/ME review preparation needed for upcoming depositions of defendants
12/21/2015	ME	0.2	telephone call with opt-in regarding exclusion due to statute of limitations
12/21/2015	MD	0.1	write defense counsel about inaccurate representation in motion 0.1
12/21/2015	ME	0.2	MD/ME review preparation needed for upcoming depositions of defendants
12/21/2015	MD	0.1	respon to defense counsel about inaccurate representation in motion 0.1
12/21/2015	ME	0.1	telephone call to opt-in regarding mileage reimbursement for deposition
			Transfer documents recd from ECF system to docket file and create file copy (Docket#328 - Stipulated MOTION for Variance from Local Civil Rule 83.1(d) in Connection With the Application for Leave to Appear Pro Hac Vice of Christiana L. Signs by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1) Exhibit A, # (2) Proposed Order)
12/21/2015	CLER	0.1	Noting Date 12/21/2015, (Nelson, James)

Date	Staff	Amount of Time	Description
			Transfer documents recd from ECF system to docket file and create file copy (Docket#329 - Stipulated MOTION for Variance from Local Civil Rule 83.1(d) in Connection With the Application for Leave to Appear Pro Hac Vice of Brian T. Feeney by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1) Exhibit A, # (2) Proposed Order)
12/21/2015	CLER	0.1	Noting Date 12/21/2015, (Nelson, James)
12/21/2015	ME	0.1	MD/ME discuss if state claims apply to excluded opt-in due to FLSA SOL
12/21/2015	MD	0.1	MD/ME discuss if state claims apply to excluded opt-in due to FLSA SOL
12/21/2015	JS	0.1	update day sheet with travel info
12/21/2015	CLER	0.1	create PDF format of documents recd from client (receipts)
12/21/2015	MD	1	digest pennington deposition 1.0
12/21/2015	JS	0.1	update day sheet with travel info
12/21/2015	ME	0.1	CM/ME discuss policy for reimbursing opt-in for deposition expenses
12/22/2015	MD	2	digest deposition of pennington 2
12/22/2015	AD	1	Compose depo digest for[client] 1.0
12/22/2015	AD	1.9	Compose depo digest for [client]
12/22/2015	ME	0.1	left voicemail for opt-in regarding question about documents
12/22/2015	MD	0.7	MD/JP/ME meeting to review discovery documents needed from defense counsel
12/22/2015	JP	0.7	MD/JP/ME meeting to review discovery documents needed from defense counsel
12/22/2015	MD	0.5	review documents to determine what's missing for proof purposes and team meeting 0.5
12/22/2015	ME	0.7	MD/JP/ME meeting to review discovery documents needed from defense counsel
12/22/2015	ME	0.1	telephone call from opt-in regarding documents
12/22/2015	ME	0.1	email defense counsel's paralegal regarding resending discovery documents
12/22/2015	MD	0.1	md/jp discuss discovery needed to prove case 0.1
12/22/2015	ME	0.1	print agenda for meeting
12/22/2015	ME	0.1	download discovery documents produced by defense counsel
12/22/2015	ME	0.5	review discovery documents produced by defense counsel
12/22/2015	JP	0.1	md/jp discuss discovery needed to prove case 0.1
12/22/2015	ME	0.2	file opt-in documents that were produced to defense counsel last week
			Transfer documents recd from ECF system to docket file and create file copy (Docket#331 - ORDER granting [328] Stipulated Motion for Variance from Local Civil Rule 83.1(D) for
12/22/2015	CLER	0.1	Christiana L. Signs; signed by Judge Ronald B. Leighton.(DN)
12/22/2015	ME	1.2	prepare opt-ins' discovery documents for production to defense counsel
12/22/2015	ME	0.2	MD/ME review questions regarding responsiveness and production of opt-in documents
			Transfer documents recd from ECF system to docket file and create file copy (Docket#330 - ORDER granting [329] Stipulated Motion for Variance from Local Civil Rule 83.1(D) for
12/22/2015	CLER	0.1	Brian T. Feeney; signed by Judge Ronald B. Leighton.(DN)
12/22/2015	MD	0.2	MD/ME review questions regarding responsiveness and production of opt-in documents
			create proof chart of documents in preparation of team meeting to follow up with
12/22/2015	MD	0.5	defense counsel 0.5
12/23/2015	AD	1.5	Compose depo digest for [client] 1.5
12/23/2015	ME	0.2	save documents produced by defense counsel
12/23/2015	MD	2	digesting deposition 2.0

Date	Staff	Amount of Time	Description
12/23/2015	ME	0.3	locate opt-in's discovery document needed to as a reference for plt's discovery demands
12/23/2015	ME	0.3	search opt-ins' emails produced by defense counsel for relevant documents
12/23/2015	ME	0.1	email MR regarding file size of discovery document produced by defense counsel
12/23/2015	AD	0.5	Depo Digest for[client] .5
12/23/2015	MR	0.1	MR/ME discuss saving large file produced by defense counsel to server
12/23/2015	ME	0.2	begin drafting interrogatory response for opt-in based on opt-in's [ ] responses
12/23/2015	ME	0.3	produce opt-ins' documents to defense counsel
			Transfer documents recd from ECF system to docket file and create file copy (Docket#334 - ORDER on the [332] Application for Leave to Appear Pro Hac Vice. The Court ADMITS Attorney Brian T Feeney for Kellogg Company and Kellogg Sales Company, by Clerk
12/23/2015	CLER	0.1	William M McCool. No document associated with this docket entry, text only.
12/23/2015	ME	0.2	edit letter responding to defense counsel about discovery issues
			Transfer documents recd from ECF system to docket file and create file copy (Docket#335 - ORDER on the [333] Application for Leave to Appear Pro Hac Vice. The Court ADMITS Attorney Christiana L Signs for Kellogg Company and Kellogg Sales Company, by Clerk
12/23/2015	CLER	0.1	William M McCool. No document associated with this docket entry, text only.
			Transfer documents recd from ECF system to docket file and create file copy (Docket#333 - APPLICATION OF ATTORNEY Christiana L. Signs FOR LEAVE TO APPEAR PRO HAC VICE for Defendants Kellogg Company, Kellogg Sales Company (Fee Paid) Receipt No. 0981-
12/23/2015	CLER	0.1	4278803 (Nelson, James)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#332 - APPLICATION OF ATTORNEY Brian T. Feeney FOR LEAVE TO APPEAR PRO HAC VICE for Defendants Kellogg Company, Kellogg Sales Company (Fee Paid) Receipt No. 0981-
12/23/2015	CLER	0.1	4278786 (Nelson, James)
12/23/2015	ME	0.1	MR/ME discuss saving large file produced by defense counsel to server
12/23/2015	MD	0.4	edit letter in response to defense counsel about discovery 0.
12/23/2015	ME	1.7	prepare opt-in discovery documents for production to defense counsel
12/23/2015	ME	0.2	edit letter to defense counsel re discovery issues
12/23/2015	MD	1	drafting letter to defense counsel concerning outstanding discovery 1.0
12/23/2015	MD	0.1	MD/ME review opt-in's document for responsiveness for production
12/23/2015	ME	0.1	email deposition transcript to opt-in to review
12/23/2015	ME	0.1	MD/ME review opt-in's document for responsiveness for production
12/23/2015	ME	0.1	save opt-in's deposition transcript files
12/24/2015	ME	0.1	save electronic copy of opt-in's deposition transcript
12/24/2015	ME	0.1	email deposition transcript to opt-in for review
12/24/2015	ME	0.4	MR/ME review process for updating and creating indexes using DT Search
12/24/2015	ME	0.1	save opt-in emails produced by defense counsel
			review supplemental facts in opposition to defendant's motion to compel and dismiss
12/24/2015	ME	0.1	brief
12/24/2015	ME	0.1	field hard copies of opt-in's discovery documents
12/24/2015	CLER	0.1	create PDF format of documents recd from client (discovery documents)
			MD/ME discuss searching opt-in emails produced by defense counsel and information needed for supplemental brief for opposition to defendant's motion to compel and
12/24/2015	MD	0.1	dismiss plaintiffs
12/24/2015	CLER	0.1	file hard copies of opt-in's discovery documents
12/24/2015	AD	2.5	Compose depo digest for [client] 2.5

Date	Staff	Amount of Time	Description
12/24/2015	ME	0.8	prepare opt-ins' discovery documents for production to defense counsel
12/24/2015	ME	0.1	save opt-in's documents sent via postal mail
12/24/2015	MR	0.4	MR/ME review process for updating and creating indexes using DT Search
12/24/2015	ME	0.4	search opt-in emails produced by defense counsel for relevant information
12/24/2015	ME	0.2	file opt-in's discovery documents produced to defense counsel
			MD/ME discuss searching opt-in emails produced by defense counsel and information needed for supplemental brief for opposition to defendant's motion to compel and
12/24/2015	ME	0.1	dismiss plaintiffs
12/24/2015	AG	0.2	conduct weekly pacer search of active FLSA cases against Defendants
12/24/2015	MD	0.2	review transcript of opt-in's deposition 0.2
12/28/2015	ME	0.1	unzip discovery files sent by defense counsel
12/28/2015	JF	0.1	Email claimant regarding responsive documents 0.1
12/28/2015	JS	0.1	call to deponenet, left vm
12/28/2015	CLER	0.1	create PDF format of correspondence recd from Walmart (reesponse to subpoena)
12/28/2015	JF	0.2	Produce Fedex label for claimant to mail responsive documents to us 0.2
12/28/2015	ME	0.8	review opt-ins' discovery documents to prepare for production to defense counsel
12/28/2015	JS	0.4	call with deponent to confirm date of depo and prep info
			review email and data from Defense Counsel regarding 2nd hit list .2, email reply to MD about work to be done on 2nd hit list .1, combine 2nd hit list data 1.1, analyze 2nd hit list
12/28/2015	MR	2.1	data .4, compose email to MD and team about 2nd hit list and suggested next steps .3
12/28/2015	ME	1.5	review and prepare opt-in discovery documents for production to defense counsel
			prepare data for Plaintiffs' Supplemental Facts In Opposition To Defendants' Motion To
12/28/2015	ME	0.6	Compel Discovery Responses And Dismiss Unresponsive Plaintiffs
12/29/2015	JS	0.1	left vm re deposition
12/29/2015	ME	0.1	email JS about communicating with opt-in about documents needed for deposition
12/29/2015	ME	0.2	resend previously produced opt-in files to defense counsel
			email MD regarding communicating with plaintiff about documents for upcoming
12/29/2015	ME	0.1	deposition
			respond to email from defense paralegal regarding resending previously produced opt-in
12/29/2015	ME	0.1	files
12/29/2015	AD	0.5	Depo digest [client] .5
12/29/2015	ME	0.1	email MD with opt-in's phone number
			update plaintiff discovery tracking spreadsheet to include information about responsive
12/29/2015	ME	1.4	documents opt-in plaintiffs have
12/29/2015	JS	0.2	js/me discuss procedure for contacting deponents and procuring documents
12/29/2015	CLER	0.3	create PDF format of documents recd from client
12/29/2015	ME	0.1	file store's response to subpoena
12/29/2015	ME	0.2	JS/ME review status of plaintiff depositions
12/29/2015	ME	0.1	save discovery documents received from opt-in via postal mail
12/29/2015	ME	0.1	email opt-in to clarify information about the document he emailed to our office
12/29/2015	JS	0.2	JS/ME review status of plaintiff depositions
12/29/2015	ME	0.2	js/me discuss procedure for contacting deponents and procuring documents
12/29/2015	ME	0.2	produce opt-ins' discovery documents to defense counsel



Date	Staff	Amount of Time	Description
12/29/2015	JK	1.4	jk review gap analysis in anticipation of creating week by week spreadsheet of extrapolated weeks for each person
12/29/2015	ME	0.3	file opt-ins' discovery documents that were produced to defense counsel .2; track production in spreadsheet .1
12/29/2015	ME	0.1	telephone call with opt-in regarding case update
12/29/2015	JK	0.4	jk identify extrapolated week from matrix
12/29/2015	ME	0.1	emailed opt-in to clarify response to answer to interrogatories
12/29/2015	JK	1.2	jk use vlookup(,,,true) functionality to pinpoint which job title is related to a particular extrapolated week
12/29/2015	JK	2.4	jk expirement with methodology to present missing weeks extrapolations week by week as requested by Respondent
12/29/2015	ME	0.3	verify status of documents recieved from opt-ins who will be deposed
12/29/2015	ME	1.6	prepare data for Plaintiffs' Supplemental Facts In Opposition To Defendants' Motion To Compel Discovery Responses And Dismiss Unresponsive Plaintiffs
12/29/2015	JK	1.2	jk use vlookup(,,,true) functionality to pinpoint which job title is related to a particular extrapolated week
12/30/2015	MR	1.7	create excel sheet to supply detail info re: damage calcs extrapolation 5
12/30/2015	JK	0.9	jk identify all gap weeks that occur within produced payroll
12/30/2015	JK	0.9	jk identify current employee extrapolation date ranges
12/30/2015	JS	0.4	call with deponent to schedule depo and prep, confirm dates, brief interview re: docs
12/30/2015	JK	0.9	jk identify all gap weeks that occur after produced payroll
12/30/2015	JK	0.9	jk identify all gap weeks that occur before produced payroll
12/30/2015	JK	1.5	jk compile list of missing weeks for IDs that match ids that had extrapolations
12/30/2015	MR	0.6	review JK completed Excel workbook on detail on all damage calcs extrapolations .2; make various formatting changes in workbook .4
12/30/2015	JK	1.2	jk Format final version of week by week extrapolations to be produced to Respondent
12/30/2015	AD	3.5	Compose depo prep digest for [client] 3.5
12/31/2015	JS	0.2	revise day sheet for depo
12/31/2015	CLER	0.5	create PDF format of documents recd from client
1/4/2016	CM	0.1	MD/CM discuss scheduling court reporter for upcoming depositions (.1)
1/4/2016	AD	1.3	Depo digest [client] 1.3
1/4/2016	CM	0.4	schedule court reporters for upcoming depositions (.4)
1/4/2016	JF	0.2	Call from claimant regarding case update 0.2
1/4/2016	MD	4	travel to RI for opt-in deposition 4.0
1/4/2016	MD	3.5	prep client for deposition 3.5
1/4/2016	JS	0.4	create current depo list with all scheduled and proposed dates
1/4/2016	ME	0.1	file discovery documents related to deponent in plaintiff's deposition folder
1/4/2016	MD	0.1	MD/CM discuss scheduling court reporter for upcoming depositions (.1)
1/4/2016	ME	0.2	prepare shipping label for opt-in to use to send discovery documents to our office
1/4/2016	ME	0.1	download discovery documents produced by defense counsel
1/4/2016	ME	0.1	save discovery documents sent via email by opt-in
1/4/2016	ME	0.1	search for specific document needed for opt-in plaintiff's deposition
1/4/2016	ME	0.1	telephone call with opposing counsel's paralegal regarding visitor list for opt-in deposition
1/4/2016	JS	0.2	md/js discuss changes to deposition schedule 0.2
1/4/2016	ME	0.1	MD/ME discuss documents needed for opt-in plaintiff's deposition
1/4/2016	MD	0.2	md/js discuss changes to deposition schedule 0.2

Date	Staff	Amount of Time	Description
1/4/2016	ME	0.4	prepare opt-in documents for production to defense counsel
1/4/2016	MD	2	review opt-in documents for deposition prep 2.0
1/4/2016	MD	0.1	MD/ME discuss documents needed for opt-in plaintiff's deposition
1/4/2016	JS	0.6	research travel for attys for depositions (taking of deft)
1/4/2016	ME	0.1	download documents produced by defense counsel for opt-in plaintiff's deposition
1/4/2016	MD	0.1	email defense counsel concerning changes to deposition schedule 0.1
1/4/2016	ME	0.1	email deposition notices to defense counsel
1/4/2016	DG	0.2	md/dg discussing deposition schedule and responsibility 0.2
1/4/2016	ME	0.2	print documents produced by defense counsel for opt-in plaintiff's deposition
1/4/2016	AD	0.9	Depo Digest for [client] .9
1/4/2016	MD	0.2	review dates for rescheduling depositions due to scheduling conflicts 0.2
1/4/2016	AD	0.7	Depo digest for client Brashear .7
1/4/2016	MD	0.2	md/dg discussing deposition schedule and responsibility 0.2
1/4/2016	CLER	0.7	print and organize documents for opt-in plaintiff's deposition prep
1/4/2016	ME	1	prepare deposition notices to send to defense counsel
1/4/2016	JS	0.4	revise depo schedule for multiple deponents for submission to def counsel
1/4/2016	ME	0.3	telephone call with opt-in for case update
1/5/2016	AN	0.2	Telephone call from opt-in with updated contact information and for case update
1/5/2016	ME	0.1	save scanned discovery documents sent by opt-in via postal mail
1/5/2016	AN	0.1	Telephone call from opt-in for case update
1/5/2016	ME	0.1	email MD regarding document for opt-in's deposition
1/5/2016	MD	5	defend [client] opt-in deposition 5.0 (30 minute lunch with discussion about deposition)
1/5/2016	MD	3.5	travel back from opt-in deposition to Kingston from RI 3.5
1/5/2016	MD	0.5	digest deposition of O'Connell 0.5
1/5/2016	DG	0.3	dg/md call re depo scheduling issues re next week's depositions .3
			review opt-in's discovery documents .2; bates stamp documents prepare for production
1/5/2016	ME	0.3	to defense counsel .1
1/5/2016	MD	0.3	dg/md call re depo scheduling issues re next week's depositions .3
1/5/2016	ME	0.2	trouble shoot issue with saving files produced by defense counsel
1/5/2016	ME	0.2	review opt-in's documents for responsiveness to defendant's discovery demands
1/5/2016	AG	0.2	conduct weekly pacer search of active FLSA cases against Defendants
			email MR regarding process for updating index of opt-in emails produced by defense
1/6/2016	ME	0.1	counsel
1/6/2016	ME	0.9	IA telephone call from claimant to review rog for supplemental information
1/6/2016	ME	0.1	MD/ME review change in defendant deposition schedule
1/6/2016	MD	0.1	MD/ME review change in defendant deposition schedule
			review documents produced by defense counsel to verify discovery demands for
1/6/2016	ME	0.2	telephone conference
1/6/2016	ME	0.1	download discovery documents produced by defense counsel
1/6/2016	ME	0.1	scan opt-in's discovery document
1/6/2016	ME	0.1	review status of completed [ ] responses for rog
			reproduce opt-in's documents to defense counsel to include additional page that was
1/6/2016	ME	0.1	previously missing
1/6/2016	ME	0.1	update tracking spreadsheet to document newest completed [ ] responses for rog
1/6/2016	JS	0.8	research flights for revision to travel itinerary

Date	Staff	Amount of Time	Description
1/6/2016	ME	0.1	email MR regarding issue with saving defendant's electronic discovery production
1/6/2016	ME	0.1	download discovery documents produced by defense counsel
1/6/2016	ME	0.4	prepare opt-in's documents to resend to defense counsel with additional page .3; bates stamp documents .1
1/6/2016	ME	0.2	review discovery documents produced by defense counsel for completeness
1/6/2016	ME	0.1	file discovery documents produced by defense counsel
1/6/2016	ME	0.1	email opt-in regarding sending discovery documents to our office
1/6/2016	ME	0.1	MR/ME review issue with saving defendant's electronic discovery documents to server
1/6/2016	ME	0.5	search for defendant's letter regarding objections to 30b6 notice
1/6/2016	MS	1.1	preparation of docs and details for [client] depo
1/6/2016	ME	0.1	email opposing counsel paralegal to request letter with objections to 30b6 deposition notice to be resent
1/6/2016	MR	0.1	MR/ME review issue with saving defendant's electronic discovery documents to server
1/6/2016	AD	1	Depo Digest [client] 1.0
1/6/2016	ME	0.2	organize electronic files of opt-in's [ ] responses for rog
1/6/2016	ME	0.1	read defendant's response to Issues Discovery Production 12-23-15
1/6/2016	ME	0.1	[compile] new opt-in responses [ ] for rog
1/6/2016	AD	2	Depo digest for [client] 2.0
1/6/2016	ME	0.2	organize client documents to be reviewed for responsiveness to RFP
1/6/2016	MD	1.5	preparing deposition outline for 30b6 deposition of Kellogg 1.5
1/6/2016	MD	3	digesting depositions of Kellogg's witnesses 3.0
1/6/2016	MD	0.5	researching and sending email to potential expert witnesses or referrals 0.5
1/6/2016	ME	0.1	voicemail to opposing counsel paralegal regarding resending objection letter to 30b6 deposition notice
1/6/2016	ME	0.2	email MD letter from defense counsel re issue with reference to opt-in's document in plaintiff's discovery letter .1; review referenced opt-in's document to determine cause of issue
1/7/2016	MR	0.1	MR/ME discuss process for obtaining discovery files from hard drive sent by defense counsel
1/7/2016	MD	1	dg/md meet and confer with def counsel re 30b6 depo .9; discuss other depo scheduling issues .1
1/7/2016	ME	1.3	search index of opt-in emails for potential exhibits to be used at defendant depositions
1/7/2016	ME	0.5	prepare updated deposition notices with revised dates to send to defendants
1/7/2016	ME	0.1	MR/ME discuss process for obtaining discovery files from hard drive sent by defense counsel
1/7/2016	DG	1	dg/md meet and confer with def counsel re 30b6 depo .9; discuss other depo scheduling issues .1
1/7/2016	ME	0.3	enter opt-in's [ ] responses into rog form .2; edit responses to prepare rog to send to defense counsel .1
1/7/2016	MD	3	drafting motion to compel 3.0
1/7/2016	MD	1.5	preparing for depositions of Kellogg's witnesses 1.5
1/7/2016	ME	0.3	enter opt-in's [ ] responses into rog form .2; edit responses to prepare rog to send to defense counsel .1
1/7/2016	MR	0.2	MR/ME discuss status of saving remaining opt-in emails produced by defense counsel to server

Date	Staff	Amount of Time	Description
1/7/2016	ME	0.3	enter opt-in's [ ] responses into rog form .2; edit responses to prepare rog to send to defense counsel .1
1/7/2016	ME	0.1	email MR regarding hard drive from defense counsel with remaning opt-in emails
1/7/2016	ME	0.1	MD/ME review tasks needed to prepare for defendant depositions
1/7/2016	ME	0.2	MR/ME discuss status of saving remaining opt-in emails produced by defense counsel to server
1/7/2016	AD	0.7	Depo digest for [client] .7
1/7/2016	MD	0.1	MD/ME review tasks needed to prepare for defendant depositions
1/7/2016	JS	0.4	add flight and hotel info to day sheet and save copies to travel planning files
1/7/2016	ME	0.1	left voicemail for opt-in deponent regarding reviewing trascript
1/7/2016	ME	0.1	telephone call to opt-in deponent regarding reviewing trascript
1/7/2016	ME	0.2	update opt-in email index to include only txt files
1/7/2016	AD	3	Depo Digest [client] 3.0
1/7/2016	ME	0.5	create index of opt-in emails so that emails can be searched by key words
1/7/2016	AG	0.1	cerate PDF format of correspondence from D. ( hard drive containing email boxes of opt-ins)
1/7/2016	MS	0.1	attending to details for clinet deposition prep
1/7/2016	ME	0.1	JP/ME review opt-in's [ ] responses for responsiveness to rog
1/8/2016	MD	1.5	drafting motion to compel 1.5
1/8/2016	ME	0.2	read letter from defense counsel regarding discovery issues unconvered during recent depositions; file letter .1
1/8/2016	MD	0.1	md/js discuss edits to motion to compel 0.1
1/8/2016	MD	0.1	send motion to compel to local counsel to review 0.1
1/8/2016	MD	0.2	prepare for call with potential expert witness 0.2
1/8/2016	MD	4	drafting deposition outline for depositions of kellogg's witnesses and reviewing documents for next week's depositions 4.0
1/8/2016	ME	0.1	reply to email from opt-in regarding transcript review
1/8/2016	AD	3	Depo digest for [client] 3.0
1/8/2016	ME	0.7	search index of opt-in emails produced by defense counsel for possible exhibits for upcoming depositions
1/8/2016	ME	0.2	save opt-in's deposition transcript documents
1/8/2016	ME	0.2	create index to include opt-in email production recently received by defense counsel
1/8/2016	ME	0.1	email opt-in's deposition transcript to opt-in to review
1/8/2016	JS	0.1	forward travel information to attys for depos
1/8/2016	MS	0.4	review personnel file, rogs, and [ ]
1/8/2016	CM	0.3	clarify changes in deposition schedule (.1), notify court reporter of changes in schedule (.2)
1/8/2016	DG	0.5	edit motion to compel TSR PTM pay data .5
1/8/2016	CM	0.1	call from court reporter to clarify deposition schedule (.1)
1/8/2016	DG	0.4	md/dg call with potential expert about report for primary job duty analysis 0.4
1/8/2016	ME	0.1	telephone call to opt-in regarding review of deposition transcript
1/8/2016	ME	0.1	left voicemail for opt-in regarding question about discovery documents
1/8/2016	MD	0.4	md/dg call with potential expert about report for primary job duty analysis 0.4
1/8/2016	JS	0.7	review and format plts mot to compel discovery
1/9/2016	JP	0.6	call and discuss documents he sent us for attorney/client privilege and possible date for depo, .4; client called back to say he was not available for 2/1 depo. .1; em MD to reschedule depo

Date	Staff	Amount of Time	Description
1/9/2016	JP	0.4	review depo prep file for completeness .2; email and voice message to client to request mandatory docs .2
1/9/2016	JP	0.4	update client depo folder, .2 and email client re status of doc production .2
1/9/2016	JP	0.2	email and voice mail to client to confirm she has sent all response docs.
1/9/2016	JP	0.3	em and vm to client regarding attorney client privilege issues in documents he produced .2; em MD request for attorney review of docs, .1
1/9/2016	JP	0.2	reviewed depo prep file for completeness
1/9/2016	JP	0.2	review depo prep file to make sure all docs are available prior to depo
1/9/2016	JP	0.2	review depo prep file to make sure all docs are available prior to depo
1/9/2016	JP	0.2	review depo prep file to make sure all docs are available prior to depo
1/9/2016	JP	0.3	update add additional docs to client depo prep file
1/9/2016	JP	0.4	review depo prep file for completeness .2; email and voice message to client to request mandatory docs .2
1/10/2016	ME	0.1	email JP regarding status of opt-in deponent's discovery documents
1/10/2016	MR	1.5	address continued issues with transferring Defendant's 100gb email production onto our server
1/10/2016	MD	4	reviewing depositions for continuation of deposition this week including Pennington, Kaminski, and O'Connell 4.0
1/10/2016	ME	0.1	IA file defendant's response to 12.23.15 discovery letter
1/10/2016	ME	0.1	check saved status of defendant discovery documents sent via hard drive
1/11/2016	MD	6	reviewing documents for deposition of Kellogg's witnesses and preparing outlines 6
1/11/2016	MD	0.2	md/dg discuss process for followup depositions and documents needed for depositions 0.2
1/11/2016	MD	0.7	finish reading Pennington deposition transcript 0.7
1/11/2016	MD	0.3	making list of topics to cover for deposition 0.3
1/11/2016	MD	0.1	dg/md discuss depositions in MI and who/what exhibits needed, etc.
1/11/2016	AD	1	depo digest [client] 1.0
1/11/2016	AD	1.1	Depo digest for claimant [client] 1.1
1/11/2016	DG	0.2	md/dg discuss process for followup depositions and documents needed for depositions 0.2
1/11/2016	DG	0.1	dg/md discuss depositions in MI and who/what exhibits needed, etc.
1/11/2016	MR	0.1	MR/ME review issue with saving defendant's production to file server and solution to the problem
1/11/2016	ME	0.1	MD/ME discuss document preparation needed for defendant depositions
1/11/2016	MD	0.1	MD/ME discuss document preparation needed for defendant depositions
1/11/2016	ME	0.1	MR/ME review status update of defendant's discovery documents that are saving to hard drive
1/11/2016	ME	0.1	MR/ME review issue with saving defendant's production to file server and solution to the problem
1/11/2016	ME	0.1	MD/ME discuss document search for direct store delivery information provided by various grocery stores
1/11/2016	ME	0.1	MD/ME discuss document preparation needed for defendant depositions
1/11/2016	MD	0.1	MD/ME discuss document preparation needed for defendant depositions
1/11/2016	ME	3	search index of opt-in emails produced by defense counsel for any possible exhibits to use for defendant depositions
1/11/2016	MR	0.1	MR/ME review status update of defendant's discovery documents that are saving to hard drive
1/11/2016	ME	0.1	JP/ME discuss status of opt-ins who are nonresponsive to discovery demands

Date	Staff	Amount of Time	Description
1/11/2016	MD	0.1	MD/ME discuss document search for direct store delivery information provided by various grocery stores
1/11/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#336 - MOTION to Compel Discovery by Plaintiff Patty Thomas. (Attachments: # (1) Exhibit 1, # (2) Proposed Order) Noting Date 1/29/2016, (Dunn, Matt)
1/11/2016	ME	0.3	save documents to use as possible exhibits for defendant depositions
1/11/2016	JP	0.1	JP/ME discuss status of opt-ins who are nonresponsive to discovery demands
1/11/2016	ME	0.5	print possible exhibits for defendant depositions
1/11/2016	ME	0.1	calculate number of opt-ins who are nonresponsive to defendant's discovery demands
1/11/2016	AG	0.1	ECF Filing of MOTION to Compel Discovery by Plaintiff Patty Thomas. (Attachments: # (1) Exhibit 1, # (2) Proposed Order)
1/11/2016	CLER	0.2	prepare mailing client (return of org. documents)
1/11/2016	AG	0.1	prepare ltr to client (return of org. documents)
1/11/2016	ME	0.5	copy hard copies of exhibits from defendant depositions that will be continued this week
1/12/2016	ME	0.5	MD/ME meeting to review documents compiled for defendant depositions and to determine further documents needed
1/12/2016	MS	0.3	prepare for depo prep w cleint
1/12/2016	ME	2.5	prepare previously used exhibits for continued defendant depositions: gather hard copies of exhibits .2; scan hard copies of exhibits 1.0; print hard copies of exhibits 1.0; organize printed exhibits .3
1/12/2016	MD	0.5	MD/ME meeting to review documents compiled for defendant depositions and to determine further documents needed
1/12/2016	AD	2	Depo Digest for [client] 2.0
1/12/2016	ME	0.2	MD/ME discuss document preparation needed for defendant depositions
1/12/2016	ME	0.5	MR/ME determine best process for saving DT search results to provide to attorney to review for possible deposition exhibits
1/12/2016	DG	8	travel to depositions in Battle Creek 4 pm - 12 pm 8
1/12/2016	MD	2	prepare for depositions (review documents/edit outline)
1/12/2016	AD	0.5	Depo digrest [client] .5
1/12/2016	MD	7.5	travel from New Paltz to Grand Rapids for depositions of Kellogg's witnesses
1/12/2016	AD	1.9	Depo Digest [client] 1.9
1/12/2016	JS	0.1	left vm re scheduling depo
1/12/2016	MS	3	depo prep with client
1/12/2016	MS	7	travel NP--Louisville
1/12/2016	JS	0.1	eml to plt re depo
1/12/2016	JS	0.1	call to plt re depo
1/12/2016	ME	0.1	download discovery documents produced by defense counsel
1/12/2016	ME	2	search/review opt-in emails produced by defense counsel for possible defendant deposition exhibits
1/12/2016	MR	0.5	MR/ME determine best process for saving DT search results to provide to attorney to review for possible deposition exhibits
1/12/2016	CLER	4	prepare possible exhibits for defendant depositions: locate and print documents 2.0; organize documents for attorneys to take to deposition 2.0
1/12/2016	MD	0.2	MD/ME discuss document preparation needed for defendant depositions
1/12/2016	ME	1	search/review management emails produced by defense counsel for possible defendant deposition exhibits



Date	Staff	Amount of Time	Description
1/13/2016	ME	0.2	prepare shipping label for claimant to use to send discovery documents to our office
			discuss results of testimony from depositions and what to cover during next depositions
1/13/2016	MD	1	1.0
1/13/2016	MD	0.8	travel from Battle Creek to Kalamazoo from depositions 0.8
			review documents and edit depositions outline and discuss deposition topics to cover
1/13/2016	MD	2	during Kim Reed's deposition
1/13/2016	AD	0.5	Depo digest for [client] .5
1/13/2016	ME	0.2	telephone call with opt-in for case update
1/13/2016	JS	0.1	call for JP
1/13/2016	DG	2	prepare for depositions and review documents/edit outline 2.0
1/13/2016	DG	3	take deposition of Pennington, Chew, and Kaminski
			travel from Grand Rapids to Battle Creek for Kellogg depositions (discuss depositions
1/13/2016	DG	1	topics in car)
			md/dg discuss results of testimony from depositions and what to cover during next
1/13/2016	DG	1	depositions 1.0
1/13/2016	JS	0.4	call with plt re depo scheduling
			travel from Battle Creek to Kalamazoo from depositions discussing results of depositions w MD
1/13/2016	DG	0.8	0.8
			review documents and edit depositions outline and discuss deposition topics to cover
1/13/2016	DG	2	during Kim Reed's deposition
1/13/2016	AD	2.5	Depo digest for [client] 2.5
1/13/2016	CM	0.2	call to court reporter re exhibits for tomorrow's deposition (.2)
1/13/2016	CM	0.1	call from court reporter re upcoming deposition schedule (.1)
1/13/2016	MD	2	prepare for depositions and review documents/edit outline 2.0
			review management emails produced by defense counsel to locate possible exhibits for
1/13/2016	ME	2	defendant depositions
1/13/2016	MS	7	travel Louisville to NP
1/13/2016	MD	3	take deposition of Pennington, Chew, and Kaminski
1/13/2016	MS	0.4	post depo debrief w/ client
1/13/2016	MS	4	defend deposition
			travel from Grand Rapids to Battle Creek for Kellogg depositions (discuss depositions
1/13/2016	MD	1	topics in car)
1/13/2016	MS	1	pre depo meeting with client
1/14/2016	MS	0.3	review of facts re doc production
			read email from para ME about needing PDFSAM software on her workstation to process
1/14/2016	MR	0.4	case documents .1, install PDFSAM .2, test installation .1
1/14/2016	AD	1.3	Depo Digest for [client] 1.3
1/14/2016	ME	0.1	telephone call to court reporter to confirm defendant deposition
1/14/2016	MS	0.6	preparation for Eire PA and Youngstown depositions
1/14/2016	MD	0.7	travel from Battle Creek to Kalamazoo from deposition 0.7
			verify that all defendant produced discovery documents have been saved in upcoming
1/14/2016	ME	0.5	opt-in deponents' files
1/14/2016	MD	1.5	take deposition of Chris Kelly 1.5
1/14/2016	MD	0.7	travel from Kalamazoo to Battle Creek for deposition 0.7
1/14/2016	MS	0.1	email re doc update
1/14/2016	CLER	0.1	create PDF format of document recd from client (signed settlement agreement)
1/14/2016	ME	0.4	search for exhibit MD requested for current defendant deposition

Date	Staff	Amount of Time	Description
			compile opt-in emails produced by defense counsel to include in upcoming deponents'
1/14/2016	ME	1.9	deposition files
1/14/2016	MD	7.5	take deposition of Kim Reed 7.5
1/14/2016	MD	0.5	discuss results of depositions 0.5
1/14/2016	DG	0.5	dg/md discuss results of depositions 0.5
1/14/2016	DG	7.5	take deposition of Kim Reed 7.5
1/14/2016	ME	0.1	telephone call from court reporter regarding defendant deposition
1/14/2016	DG	1.5	second seat deposition of Chris Kelly 1.5
1/14/2016	DG	0.7	travel from Battle Creek to Kalamazoo from deposition 0.7
			travel from Kalamazoo to Battle Creek for deposition, prepping for all depositions with MD
1/14/2016	DG	0.7	during ride 0.7
1/14/2016	CLER	0.2	file hard copies of deposition transcripts and exhibits
1/15/2016	ME	0.2	compile possible email exhibits for defendant depositions
1/15/2016	MR	0.2	MD/MR/JP discuss issue with defendant email production
1/15/2016	ME	0.1	email defense counsel regarding visitor list for next week's defendant deposition
1/15/2016	MD	0.2	MD/MR/JP discuss issue with defendant email production
1/15/2016	ME	0.1	email defendant paralegal regarding issue with email production
1/15/2016	JS	0.3	research hotel, book for deponent
1/15/2016	ME	0.3	search for exhibit MD requested for current defendant deposition
1/15/2016	ME	0.3	review defendant discovery documents
1/15/2016	ME	0.1	determine if court reporter was scheduled for next week's defendant deposition
1/15/2016	CLER	0.1	file documents produced by defense counsel in deponent folders
1/15/2016	ME	0.2	MD/MR/JP discuss issue with defendant email production
1/15/2016	MR	0.5	prep laptop for MS PA depositions trip.
1/15/2016	CLER	0.2	produce opt-in documents to defense counsel .1; track and file documents .1
1/15/2016	ME	0.3	review status of opt-in discovery responses
1/15/2016	MS	0.8	reviewing and annotating late production in preparation for depo
			travel to deposition .8; prep for deposition .3; deposition 9-2:10 [with prep during most breaks]; 4.7; travel home [with flight delays, resulting in change of flight to diff airport,
1/15/2016	MD	16.6	rental car etc. 2:30 pm - 1:13 am 10.8
1/15/2016	JS	0.1	eml to plt re depo scheduling
1/15/2016	JS	0.3	call to plt re: depo prep and scheduling
1/15/2016	JS	0.7	review hotel billing to ensure accuracy
1/15/2016	CLER	1	create PDF format of documents recd from client (discovery)
1/15/2016	ME	0.1	call court reporter to change end time of deposition
1/15/2016	ME	0.3	MS/ME discuss defendant's discovery production for opt-in deponents
			travel to deposition .8; prep for deposition .3; deposition 9-2:10 [with prep during most breaks]; 4.7; travel home [with flight delays, resulting in change of flight to diff airport,
1/15/2016	DG	15.4	rental car etc. 2:30 pm - 1 am 10.5 - less time working on other cases .9
1/15/2016	ME	0.1	JP/ME review process for redacting privilege information from opt-in's documents
1/15/2016	MS	0.3	MS/ME discuss defendant's discovery production for opt-in deponents
1/15/2016	JP	0.1	JP/ME review process for redacting privilege information from opt-in's documents
			DG/MD/MR/JP/ME discuss possibility of second mediation .3; defendant deposition
1/15/2016	MD	0.4	briefing

Date	Staff	Amount of Time	Description
1/15/2016	DG	0.4	DG/MD/MR/JP/ME discuss possibility of second mediation .3; defendant deposition briefing
1/15/2016	MD	0.2	dg/md discuss Groulx depo prep .2
1/15/2016	MR	0.4	DG/MD/MR/JP/ME discuss possibility of second mediation .3; defendant deposition briefing
1/15/2016	JP	0.4	DG/MD/MR/JP/ME discuss possibility of second mediation .3; defendant deposition briefing
1/15/2016	ME	0.1	download and save documents produced by defense counsel
1/15/2016	ME	0.3	conduct dt search for opt-in's emails produced by defense counsel
1/15/2016	MS	1.1	review and prepare docs for depo defense
1/15/2016	JS	0.2	call with plt re depo scheduling and logistics
1/15/2016	DG	0.2	dg/md discuss Groulx depo prep .2
1/15/2016	MR	0.1	read email reply from MD about need for documents for his depositions next week
1/15/2016	MS	1.2	reviewing and annotating doc production for depo prep
1/15/2016	AG	0.3	arrange court reporter for Keith Oldre (Phil. Pa)
1/15/2016	MS	0.9	review and annotate doc production for depo prep
1/15/2016	ME	0.1	save and track discovery documents sent via email by opt-in
1/15/2016	ME	0.3	search for Kellogg employee's job title per request of MD for defendant deposition
1/15/2016	MR	0.1	email to MD about need for documents for his depositions next week
1/15/2016	ME	0.4	DG/MD/MR/JP/ME discuss possibility of second mediation .3; defendant deposition briefing
1/16/2016	DG	0.3	enter time records from depositions .2; organize files and computer to leave for MD/MR reorg .1
1/18/2016	MD	3.5	prep client for deposition 3.5
1/18/2016	MD	2	travel to hotel from client 2.0
1/18/2016	MS	7	travel NP--Eire
1/18/2016	MD	12.5	travel to seattle from new paltz for depositions 12.5
1/18/2016	MS	0.1	conf w/ client re rescheduling due to weather
1/18/2016	MS	3	prep client
1/18/2016	MD	0.1	text client about prep for deposition 0.1
1/18/2016	MS	0.2	prepare for client prep
1/18/2016	MD	0.1	contact ms about deposition 0.1
1/18/2016	MS	0.1	2nd tc w/ opposing counsel re rescheduling due to weather
1/18/2016	MS	0.2	tc w/ opposing counsel re rescheduling due to weather
1/18/2016	MD	0.1	text dg about outline for deposition of kellogg witness 0.1
1/18/2016	MR	0.1	email to MD about laptop needs for his next depositions
1/19/2016	MD	1.5	research KY and MI state law per Kellogg Rule 11 letter 1.5
1/19/2016	JS	0.1	left vm re depo rescheduling
1/19/2016	MS	0.6	meeting w/ client re deposition, scheduling, and additional questions
1/19/2016	MD	1	md/dg discuss topics to question K. Oldre about during deposition 1.0
1/19/2016	DG	3.5	travel to deposition of Keith Oldre 3.5
1/19/2016	JS	0.2	call with plt re depo rescheduling
1/19/2016	MS	0.1	tc w/ md re update on Kellogg depositions
1/19/2016	ME	0.1	MR/ME discuss defendant's ESI email production
1/19/2016	MS	0.2	arrangements to postpone depo
1/19/2016	MS	0.1	MS/ME discuss defendant's production of emails for opt-in deponents
1/19/2016	MD	5.5	defend deposition 5.5
1/19/2016	JS	0.3	call with plt re depo scheduling

Date	Staff	Amount of Time	Description
1/19/2016	ME	0.3	MD/ME review documents needed for defendant deposition
1/19/2016	CLER	4.9	prepare possible exhibits for defendant deposition: compile documents 2.0; print documents 1.9; organize documents 1.0
1/19/2016	DG	1	md/dg discuss topics to question K. Oldre about during deposition 1.0
1/19/2016	MD	0.3	MD/ME review documents needed for defendant deposition
1/19/2016	JS	0.1	eml to plt re depo
1/19/2016	MD	2	review documents for deposition of client 2.0
1/19/2016	MS	0.4	prepare for depo prep
1/19/2016	MS	3	meet with client to prepare for depo
1/19/2016	ME	0.1	MS/ME discuss defendant's production of emails for opt-in deponents
1/19/2016	JS	0.4	research pub trans options for depo prep meeting
1/19/2016	MS	0.5	review new email production
1/19/2016	MR	0.1	MR/ME discuss defendant's ESI email production
1/19/2016	ME	0.1	email defendant deposition notice to DG
1/19/2016	ME	0.1	email opt-in deponents' consents to sue to MD
1/19/2016	JS	0.1	eml to atty re scheduling
1/19/2016	MS	0.2	email to Kellogg counsel re conditions for moving depo
1/20/2016	ME	0.1	email rog to opt-in for review before producing to defense counsel
1/20/2016	ME	0.3	review status of opt-in rog production
1/20/2016	JS	0.2	multiple emls re depo scheduling
1/20/2016	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
1/20/2016	ME	0.2	download and file discovery document produced by defense counsel .1; email document to DG to use as possible exhibit in deposition
1/20/2016	JS	0.2	call with deponent re scheduling prep and depo
1/20/2016	MD	3	prepare client for deposition 3.0
1/20/2016	MD	3.5	defend deposition of client 3.5
1/20/2016	ME	0.5	prepare opt-in's answer to interrogatories to send to opt-in for review before producing to defense counsel
1/20/2016	JP	0.1	JP/ME determine priority tasks to be completed for opt-in discovery
1/20/2016	ME	0.1	email rog to opt-in for review before producing to defense counsel
1/20/2016	MR	0.1	MR/ME discuss time studies produced by defense counsel
1/20/2016	ME	0.2	compile time study discovery documents produced by defense counsel to send to MR for review
1/20/2016	ME	0.1	JP/ME determine priority tasks to be completed for opt-in discovery
1/20/2016	ME	0.1	email rog to opt-in for review before producing to defense counsel
1/20/2016	ME	0.1	MR/ME discuss time studies produced by defense counsel
1/20/2016	ME	0.3	search for document needed by attorney for current opt-in deposition
1/20/2016	MS	3	defend depo
1/20/2016	MS	0.6	meet with client for final depo prep
1/20/2016	DG	12.25	8:30 am travel to Depo .5; prep for Depo .5; Depo 10-7 8.5 including prep at breaks; return travel 7:30-11:15 3.75 12.25 total
1/20/2016	MS	0.6	review new email production
1/20/2016	ME	0.2	search for documents for attorney to use at current opt-in's deposition
1/20/2016	MS	1.5	travel Erie to Youngstown
1/20/2016	MS	0.3	post depo discussion
1/20/2016	ME	0.1	search for document DG would like for defendant deposition
1/20/2016	MS	0.3	meet with client for final depo prep
1/20/2016	MS	2.5	defend deposition
1/20/2016	MS	0.3	post depo meeting

Date	Staff	Amount of Time	Description
			examine and compare new Groulx excel data compared with previous pdf documents .6,
1/20/2016	MR	0.8	email comparisons to team .2
1/20/2016	MD	1.5	review documents in preparation of deposition 1.5
1/20/2016	MR	0.3	MR/ME review details of pdf and excel production of time studies data
1/20/2016	ME	0.2	download and file discovery document produced by defense counsel; email link to document to litigation team
1/20/2016	MD	4	prepare client for deposition 4.0
1/20/2016	MS	0.5	review docs in preparation for meeting w/ client
1/20/2016	ME	0.3	MR/ME review details of pdf and excel production of time studies data
1/20/2016	MR	0.4	review court order for production of client rogs and documents .2, review briefs related to court order .2
1/21/2016	MR	1	DG/MD/JP/MR/ME review defendant's motion to compel opt-in discovery and dismiss nonresponsive opt-ins .3; create plan to complete discovery as ordered
1/21/2016	JP	1	DG/MD/JP/MR/ME review defendant's motion to compel opt-in discovery and dismiss nonresponsive opt-ins .3; create plan to complete discovery as ordered
1/21/2016	MD	1	DG/MD/JP/MR/ME review defendant's motion to compel opt-in discovery and dismiss nonresponsive opt-ins .3; create plan to complete discovery as ordered
1/21/2016	DG	1	DG/MD/JP/MR/ME review defendant's motion to compel opt-in discovery and dismiss nonresponsive opt-ins .3; create plan to complete discovery as ordered
1/21/2016	ME	0.2	review email to opt-in's regarding dismissal due to lack of response to rog
1/21/2016	JS	0.3	call for update
1/21/2016	ME	0.3	organize opt-in documents produced to defense counsel
1/21/2016	ME	0.2	compile rogs from named plaintiffs
1/21/2016	ME	1	DG/MD/JP/MR/ME review defendant's motion to compel opt-in discovery and dismiss nonresponsive opt-ins .3; create plan to complete discovery as ordered
1/21/2016	MD	0.1	email dg about calling boudreau re settlement and moving case forward 0.1
1/21/2016	ME	0.5	[compile] [interrogatory] responses and prepare list of opt-ins who are current employees and ex employees for responding to order granting defendant's motion to compel opt-in discovery responses
1/21/2016	JS	0.2	update depo tracking spreadsheet
1/21/2016	JP	0.5	JP/ME review [ ] for answer to interrogatories to determine any edits that need to be made
1/21/2016	ME	0.5	JP/ME review [ ] for answer to interrogatories to determine any edits that need to be made
1/21/2016	MS	2.5	prepping client for deposition
1/21/2016	MD	0.2	call with defense counsel about mediation 0.2
1/21/2016	MD	0.8	md/ms discuss strategy to move case forward/resolve case .8
1/21/2016	MS	0.5	travel with client to depo
1/21/2016	MD	0.1	email team about call with defense counsel re mediation 0.1
1/21/2016	DG	1.6	DG/JP/ME/MR(in part) review Order granting defendant's motion to compel discovery and dismiss nonresponsive opt-ins .4; read order .5; review def submissions to understand order .7
1/21/2016	MS	2.5	defending client depo
1/21/2016	MD	0.3	walk from deposition to hotel 0.3
1/21/2016	MR	6.8	work on analysis of our tracking rog and document sheets and Defendants Exhibit A: name matchup for data comparisons and lookup tables 1.8, docs and rogs produced since MTC briefs 1.5, Ex A names who are current employees 1.2, excluded clients 1.0, subsets of Exhibit A .7, write-up detailed email for team .6
1/21/2016	MS	7.5	travel Youngstown, OH--NP

Date	Staff	Amount of Time	Description
1/21/2016	MR	0.4	MR/ME review data from exhibit A of defendant's motion to compel opt-in discovery and dismiss nonresponsive opt-ins
1/21/2016	JP	0.4	DG/JP/ME/MR(in part) review Order granting defendant's motion to compel discovery and dismiss nonresponsive opt-ins
1/21/2016	ME	3.5	prepare opt-in's documents for production by: reviewing documents 1.5; organizing documents 1.0; redacting privilege information .5; bates stamping responsive documents .5
1/21/2016	MR	0.3	DG/JP/ME/MR(in part) review Order granting defendant's motion to compel discovery and dismiss nonresponsive opt-ins
1/21/2016	MD	0.3	walk to deposition from hotel 0.3
1/21/2016	MS	0.2	post depo client meeting
1/21/2016	ME	0.4	DG/JP/ME/MR(in part) review Order granting defendant's motion to compel discovery and dismiss nonresponsive opt-ins
1/21/2016	ME	0.4	MR/ME review data from exhibit A of defendant's motion to compel opt-in discovery and dismiss nonresponsive opt-ins
1/21/2016	MD	2.5	defend deposition 2.5
1/21/2016	MS	0.8	md/ms discuss strategy to move case forward/resolve case .8
1/22/2016	ME	1	JP/MR/ME review comparison of defendant's data from Exhibit A of motion to compel opt-in discovery reponses to our data regarding opt-in's disoccovery responses .9; review estimated damage calculations for nonresponsive opt-ins
1/22/2016	ME	0.2	download digital transcripts from defendant's continued depositions .1; file transcripts on server .1
1/22/2016	MD	9	travel from seattle to home from depositions 9.0
1/22/2016	ME	0.5	review opt-in documents for responsiveness
1/22/2016	ME	0.5	JP/ME create plan for contacting nonresponsive opt-ins regarding dismissal
1/22/2016	JP	0.5	JP/ME create plan for contacting nonresponsive opt-ins regarding dismissal
1/22/2016	MD	0.7	ms/dg/md telephone conference regarding strategy for Kellogg mediation and stay of litigation
1/22/2016	MR	0.6	create enhanced version of Defendant Ex.A from their MTC for use by team in relation to MR analysis writeout
1/22/2016	JP	1	JP/MR/ME review comparison of defendant's data from Exhibit A of motion to compel opt-in discovery reponses to our data regarding opt-in's disoccovery responses .9; review estimated damage calculations for nonresponsive opt-ins
1/22/2016	DG	0.7	ms/dg/md telephone conference regarding strategy for Kellogg mediation and stay of litigation
1/22/2016	MR	1	JP/MR/ME review comparison of defendant's data from Exhibit A of motion to compel opt-in discovery reponses to our data regarding opt-in's disoccovery responses .9; review estimated damage calculations for nonresponsive opt-ins
1/22/2016	MR	0.3	check over last night's work on rog and doc production analysis .1, copy modified files from lab computer to external drive .1, post email to team about next steps to generate rog and doc worksheet .1
1/22/2016	MS	0.7	ms/dg/md telephone conference regarding strategy for Kellogg mediation and stay of litigation
1/22/2016	MR	4	create Tab 2a worksheet including estimated award figures for plaintiffs 2.2, create Tab 1 worksheet 1.5, create Tab 3 worksheet .3
1/23/2016	MR	0.2	create new Time Matters list for addresses, phone and emails on doc and rog worksheets
1/23/2016	MR	1.9	review discrepancies for client count and excluded client count between Aug 2015 and Jan 2016 TM sheets .9, review damage calcs relating to damage estimate figures for use in contacting clients about missing rogs and docs 1.0



Date	Staff	Amount of Time	Description
1/23/2016	MR	0.2	create next steps to do list regarding rog and document production
			use new TM list for addresses and phone .7, examine and annotate issue of two more
1/24/2016	MR	1.5	excluded and four more clients since last TM list .8,
1/24/2016	MR	0.1	update todo list for Kellogg doc/rog worksheet project
			rework and revise worksheets for doc and rog Ex. A production .7, add phone and address info .6, break out the 22/23 people from Tab2a 1.1, combine all four sheets into
1/24/2016	MR	3.1	one workbook .7
1/25/2016	MR	0.1	md/mr discuss dates proposed in proposed stay 0.1
1/25/2016	CM	0.2	review draft of email to opt-ins re documents (.2)
1/25/2016	MD	0.1	md/mr discuss dates proposed in proposed stay 0.1
1/25/2016	MD	0.2	email defense counsel extrapolation data and review data 0.2
1/25/2016	MD	0.2	md/ms discuss how clients performed during deposition and successful strategies 0.2
1/25/2016	MD	0.2	email defense counsel about motion to stay for mediation 0.2
1/25/2016	JP	1	md/jp/mr meet re responding to discovery because of court's order 1.0 (mr 0.8)
1/25/2016	JK	0.5	JK review of previous extrapolation work to determine if any clients are missing
1/25/2016	MD	1	md/jp/mr meet re responding to discovery because of court's order 1.0 (mr 0.8)
			Pull in client name, status and totals into the various sheets in the extrapolation details
1/25/2016	MR	3.9	workbook 3.6, briefly examine results .3
1/25/2016	MS	0.2	md/ms discuss how clients performed during deposition and successful strategies 0.2
1/25/2016	MD	0.4	edit motion to stay for mediation 0.4
1/25/2016	MR	0.1	email reminder to MD about sending extrapolation data to Def Counsel
1/25/2016	MR	0.8	md/jp/mr meet re responding to discovery because of court's order 1.0 (mr 0.8)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#339 - STIPULATION AND ORDER setting Discovery Deadlines as follows: Identify Affirmative Experts (for certification and merits issues only) by Feb. 5, 2016: Initial Affirmative Expert Reports (for certification and merits issues only) due by Feb. 5, 2016: Fact Discovery Deadline is March 4, 2016; Identify Rebuttal Expert and Rebuttal Expert Reports by March 4, 2016; Expert Discovery Deadline (for certification and merits issues only) due by
1/25/2016	CLER	0.1	April 1, 2016.
			Transfer documents recd from ECF system to docket file and create file copy (Docket#338 - ORDER granting [318] Motion to Compel Discovery Responses/Dismiss Unresponsive
1/25/2016	CLER	0.1	Plaintiffs by Judge Ronald B. Leighton.(JAB)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#337- ORDER granting [311] Motion to Compel Defendants to produce the Willard Bishop study, time stamp records including KSTARS, CRS/Motus and ARIFleet data by Judge
1/25/2016	CLER	0.1	Ronald B. Leighton. (see order for details)(JAB)
			MD/JP/MR(in part)/ME review information needed from opt-in plaintiffs to comply with Order regarding discovery .5; discuss preparation needed for team meeting to review risk
1/26/2016	ME	0.7	assessment for mediation
			investigate and fix incorrect CTS year plaintiffs in damage calcs .7, examine extrapolations for excl and ocli plaintiffs .4, examine other missing plaintiffs in damage calcs .4, pull in dollars amount columns into rogs/docs worksheets 1.3, investigate [client] vs [client]
1/26/2016	MR	3.1	issue .3
			MR/ME review different categories of nonresponsive plaintiff's from defendant's exhibit
1/26/2016	ME	0.3	A from motion to compel
1/26/2016	MR	0.2	JP/MR discussed aspects of tracking/collecting rogs and docs per Def MTC
1/26/2016	AD	0.5	Depo Digest [client] .5

Date	Staff	Amount of Time	Description
1/26/2016	JP	0.7	MD/JP/MR(in part)/ME review information needed from opt-in plaintiffs to comply with Order regarding discovery .5; discuss preparation needed for team meeting to review risk assessment for mediation
1/26/2016	MR	0.3	MR/ME review different categories of nonresponsive plaintiff's from defendant's exhibit A from motion to compel
1/26/2016	JP	0.4	JP/ME review plan for obtaining remaining discovery from opt-in plaintiffs to comply with Order
1/26/2016	MR	0.9	added columns linked to specific columns in the 11.4.5 Tracking Answers to Rogs workbook .9
1/26/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (SETTING the NOTING DATE for the [341] Stipulated MOTION and Proposed Order to Stay Case for 1/25/2016. (CMG)
1/26/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (NOTICE of Docket Text Modification re [341] Stipulated MOTION : corrected event type to put on the court's motion docket. (CMG)
1/26/2016	ME	0.9	JP/ME review and edit draft emails to opt-ins regarding complying with discovery
1/26/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#341 - STIPULATION AND PROPOSED ORDER to Stay Case Pending Mediation and Continue Court Deadlines for 45 Days by parties (Nelson, James)
1/26/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#340 - RESPONSE, by Defendants Kellogg Company, Kellogg Sales Company, to [336] MOTION to Compel Discovery. (Attachments: # (1) Exhibit A to Defendants' Response to Plaintiff's Motion to Compel Discovery, # (2) Proposed Order)(Nelson, James)
1/26/2016	JP	0.9	JP/ME review and edit draft emails to opt-ins regarding complying with discovery
1/26/2016	ME	0.3	read emails to different categories of opt-in plaintiffs who need to comply with discovery Order
1/26/2016	MR	0.2	MD/JP/MR(in part)/ME review information needed from opt-in plaintiffs to comply with Order regarding discovery .5; discuss preparation needed for team meeting to review risk assessment for mediation
1/26/2016	MD	0.7	MD/JP/MR(in part)/ME review information needed from opt-in plaintiffs to comply with Order regarding discovery .5; discuss preparation needed for team meeting to review risk assessment for mediation
1/26/2016	MR	0.5	research methods to create fill-in box for initials in outlook message .4, email possible approaches to JP and ME .1
1/26/2016	JP	0.2	JP/MR discussed aspects of tracking/collecting rogs and docs per Def MTC
1/26/2016	AD	2.7	Depo digest of [client] 2.7
1/26/2016	ME	2.3	JP/ME edit emails to different categories of plaintiffs regarding complying with discovery Order
1/26/2016	ME	0.3	JP/ME update [ ] to opt-ins for answer to interrogatories
1/26/2016	JP	0.3	JP/ME update [ ] to opt-ins for answer to interrogatories
1/26/2016	ME	0.4	JP/ME review plan for obtaining remaining discovery from opt-in plaintiffs to comply with Order
1/27/2016	ME	0.1	review [ ] for category of opt-ins to receive regarding specific questions to answer to interrogatories
1/27/2016	JF	0.2	Edit outgoing Kellogg email for claimants to undertake [ ] 0.2
1/27/2016	ME	0.2	prepare opt-in discovery documents for production to defense counsel

Date	Staff	Amount of Time	Description
1/27/2016	MD	0.2	md/dg discuss status of stay and moving forward with plaintiffs' discovery production 0.2
1/27/2016	AD	0.8	Edit Depo Digest [client] .8
1/27/2016	CLER	0.3	prepare mailing client (return of org. documents)
1/27/2016	ME	0.6	compile list of opt-ins who should not receive email regarding complying with discovery Order
1/27/2016	ME	1	draft email to one category of opt-ins regarding complying with discovery Order
1/27/2016	ME	0.1	MR/ME compare data from our tracking spreadsheet to defendant's exhibit A for motion to compel opt-in discovery
1/27/2016	JP	0.2	JP/ME discuss draft email to opt-in regarding complying with discovery Order
1/27/2016	ME	0.3	review/edit [ ] for opt-ins who still need to comply with discovery Order
1/27/2016	MR	0.1	MR/ME compare data from our tracking spreadsheet to defendant's exhibit A for motion to compel opt-in discovery
1/27/2016	ME	0.2	JP/ME discuss draft email to opt-in regarding complying with discovery Order
1/27/2016	MD	0.3	md/ms discuss mediation process and reevaluating risk 0.3
1/27/2016	JP	0.4	JP/ME edit [ ] and email for specific category of opt-ins regarding complying with discovery Order
1/27/2016	ME	0.4	JP/ME edit [ ] and email for specific category of opt-ins regarding complying with discovery Order
1/27/2016	MR	4.3	work on mail merge for plaintiff groups 1,2,4, 5 for mailer for rogs and docs 4.3
1/27/2016	ME	0.8	review status of depositions received for opt-in deponents .3; review status of opt-in deponent review of deposition transcript .3; create tracking spreadsheet for deposition transcript receipt and review .2
1/27/2016	AD	3.7	Edit depo digest for [client] 3.7
1/27/2016	MS	0.3	md/ms discuss mediation process and reevaluating risk 0.3
1/27/2016	ME	0.1	review discovery documents sent by opt-in
1/28/2016	JP	0.1	JP/ME discuss responding to opt-ins' possible questions regarding estimated settlement amount
1/28/2016	MR	0.2	MR/ME discuss process for sending emails regarding complying with discovery Order to opt-ins
1/28/2016	ME	0.1	JP/ME discuss responding to opt-ins' possible questions regarding estimated settlement amount
1/28/2016	MR	1	rework group1 merge files .5, run merge test .1, run mail merge group 1 emails .4
1/28/2016	ME	0.4	search opt-in emails and management emails produced by defense counsel for specific information related to outside sales .3; create reports of search results for attorney review
1/28/2016	JP	3	JP/ME discuss process for complying with discovery order 1.0; prepare emails and [ ] to opt-ins for complying with discovery order 2.0
1/28/2016	JP	7.5	Review Order re motion to compel for all plts who need docs or rogs, Work on emails and [ ] to get information plaintiffs have not produced (or risk being dismissed from the case)
1/28/2016	MD	0.2	respond to defense counsel attorney about depositions via email and phone 0.2
1/28/2016	MD	0.2	respond to defense counsel paralegal about depositions 0.2
1/28/2016	MR	1 1.0	md/mr/me/jp reviewing email to send to clients in order to respond to motion to compel
1/28/2016	JP	1 1.0	md/mr/me/jp reviewing email to send to clients in order to respond to motion to compel

Date	Staff	Amount of Time	Description
1/28/2016	ME	1 1.0	md/mr/me/jp reviewing email to send to clients in order to respond to motion to compel
1/28/2016	MD	1 1.0	md/mr/me/jp reviewing email to send to clients in order to respond to motion to compel
1/28/2016	MR	0.5	fixed problem in columns linked to specific columns in the 11.4.5 Tracking Answers to Rogs workbook .5
1/28/2016	ME	0.2	MR/ME discuss process for sending emails regarding complying with discovery Order to opt-ins
1/28/2016	MR	0.9	rework group2 merge files .5, run mail merge group 2 emails .4
1/28/2016	MD	0.1	contact attorney about Boudreau for mediation 0.1
1/28/2016	ME	3	JP/ME discuss process for complying with discovery order 1.0; prepare emails and [ ] to opt-ins for complying with discovery order 2.0
1/28/2016	MD	0.6	researching trial verdicts on willfulness 0.6
1/29/2016	MR	0.1	read and reply to para ME email regarding amended rogs information
1/29/2016	MD	0.3	md/dg discuss mediation strategy and status of plaintiff discovery production 0.3
1/29/2016	DG	0.3	md/dg discuss mediation strategy and status of plaintiff discovery production 0.3
1/29/2016	ME	0.2	respond to opt-in's email regarding complying with discovery order
1/29/2016	MD	0.3	call with client about producing documents 0.3
1/29/2016	ME	4	review individual opt-ins' discovery status and send individualized emails explaining what they need to do to comply with discovery order
1/29/2016	MR	1.6	rework group 4 merge files .4, rework group 5 merge files .4, run and test mail merge for group 4, .4, run and test mail merge for group 5, .4
1/29/2016	JP	3	JP/ME prepare emails and [ ] to opt-ins for complying with discovery order
1/29/2016	ME	3	JP/ME prepare emails and [ ] to opt-ins for complying with discovery order
1/29/2016	MR	0.3	read and reply to email from JP about sentence correction .1, correct sentence in question from mail merge .2
1/29/2016	ME	0.2	telephone call from opt-in for case update
1/29/2016	MR	1	pull in amended answers produced column from rog tracking sheet to 5 group sheets (5 spreadsheets) 1.0
1/29/2016	ME	0.2	telephone call from opt-in regarding documents to comply with discovery order
1/29/2016	ME	0.1	respond to opt-in's email regarding complying with discovery order
1/29/2016	ME	0.1	send email to opt-in with answer to interrogatories for review
1/29/2016	ME	0.1	send email to opt-in with answer to interrogatories for review
1/29/2016	ME	0.2	email deposition transcript to opt-in for review
1/29/2016	ME	0.1	send email to opt-in with answer to interrogatories for review
1/30/2016	ME	0.2	telephone call with opt-in regarding documents for discovery
1/30/2016	ME	0.1	save emails sent to opt-ins regarding complying with discovery order
1/30/2016	ME	3.6	prepare opt-in's discovery documents for production to defense counsel
1/30/2016	ME	0.1	send email to opt-in regarding [questions] for complying with discovery order
2/1/2016	ME	0.2	telephone call with opt-in regarding sending discovery documents to our office
2/1/2016	ME	0.3	review emails that bounced back from group mailing to determine which opt-ins need a phone call to update contact information
2/1/2016	MR	0.1	ME/MR discuss email from JP about ping/GPS system
2/1/2016	ME	0.2	review status of opt-in's discovery responses .1; left voicemail for opt-in regarding discovery order .1
2/1/2016	JP	0.2	JP/ME review list of opt-ins who need contacted regarding complying with discovery order via phone

Date	Staff	Amount of Time	Description
2/1/2016	ME	0.2	produce discovery documents to defense counsel
2/1/2016	MD	1	md confer with ME/JP about discovery issues for opt-ins 1.0
			JP/ME review list of opt-ins who need contacted regarding complying with discovery
2/1/2016	ME	0.2	order via phone
2/1/2016	ME	0.4	track discovery documents produced to defense counsel
2/1/2016	ME	0.2	draft amended answer to interrogatories for opt-in per opt-in's request
2/1/2016	ME	0.1	respond to email from opt-in regarding complying with discovery order
2/1/2016	ME	0.1	review status of opt-in's discovery responses
2/1/2016	JS	0.3	email deposition preparation link to scheduled deponents
			review new emails in inbox from opt-ins regarding discovery and mark those that need
2/1/2016	ME	0.3	further attention
2/1/2016	JF	0.1	Call from claimant 0.1
2/1/2016	MD	0.5	call clients about concerns about continuing in case 0.5
2/1/2016	MR	1.1	analysis of Motus ping/GPS data, email to team about same .1
2/1/2016	ME	0.3	telephone call from opt-in for case update
			JP/ME review process for organizing information provided by opt-ins for discovery
2/1/2016	JP	1	requests
2/1/2016	ME	0.1	save emails sent to opt-ins regarding complying with discovery order
2/1/2016	ME	0.2	respond to opt-in's email regarding discovery documents
2/1/2016	ME	0.1	email opt-in regarding sending discovery documents
2/1/2016	ME	2.9	prepare opt-ins' discovery documents for production to defense counsel
2/1/2016	CLER	0.2	create PDF format of documents recd from client
2/1/2016	ME	0.1	ME/MR discuss email from JP about ping/GPS system
			combine 5 groups data in single spreadsheet .7, pull selected info from 5 groups data into
2/1/2016	MR	1.5	rog/doc tracking sheet for JP and ME .8
2/1/2016	ME	0.1	respond to email from opt-in regarding complying with discovery order
			JP/MR/ME review process for tracking responses regarding motion to compel opt-in
2/1/2016	JP	0.5	discovery
2/1/2016	JF	1.2	Prepare amended interrogatories letters for submission to the defendant 1.2
			JP/MR/ME review process for tracking responses regarding motion to compel opt-in
2/1/2016	ME	0.5	discovery
			JP/MR/ME review process for tracking responses regarding motion to compel opt-in
2/1/2016	MR	0.5	discovery
2/1/2016	ME	0.1	respond to opt-in's email regarding discovery documents
			JP/ME review process for organizing information provided by opt-ins for discovery
2/1/2016	ME	1	requests
2/1/2016	CM	0.2	call from client re discovery responses (.2)
2/2/2016	ME	0.1	file discovery documents sent by opt-ins
			JF/ME review task for determining which group opt-in's are in for complying with
2/2/2016	ME	0.2	discovery order
2/2/2016	ME	0.2	review emails from opt-ins and mark those that need further attention
2/2/2016	ME	0.2	JP/ME review explaining to opt-in how estimated settlement figures are calculated
2/2/2016	JP	0.2	JP/ME review explaining to opt-in how estimated settlement figures are calculated
2/2/2016	AN	0.1	Telephone call from opt-in
2/2/2016	ME	0.1	telephone call from opt-in regarding documents
2/2/2016	ME	1.2	file opt-in discovery documents produced to defense counsel this week
2/2/2016	MR	0.3	check-in with JP and ME about rog/doc tracking and production
2/2/2016	MD	0.2	read court orders re stay and order to compel 0.2

Date	Staff	Amount of Time	Description
2/2/2016	CLER	0.2	create PDF format of documents recd from client (discovery documents)
2/2/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)
2/2/2016	AG	0.3	conduct people search for current contact information of client
2/2/2016	JP	0.3	JP/ME meet to determine tasks that can be delegated for complying with discovery order
2/2/2016	ME	0.8	compile list of opt-ins who produced a rog after defendant's exhibit A to motion to compel was created .2; update spreadsheet to include this information .6
2/2/2016	JP	0.3	check-in with JP and ME about rog/doc tracking and production
2/2/2016	MD	1	md meet with ME/JP re discovery responses 1.0
2/2/2016	ME	0.3	check-in with JP and ME about rog/doc tracking and production
2/2/2016	ME	0.3	download, save, and email defendant production to litigation team
2/2/2016	JF	1.1	Crosscheck [ ] responses with TM for contact information updates 1.1
2/2/2016	JF	1.2	Crosscheck [ ] responses with TM for contact information updates 1.2
2/2/2016	ME	0.2	telephone call with opt-in regarding discovery documents
2/2/2016	JF	0.2	Call to claimant regarding proper spelling of last name 0.2
2/2/2016	CLER	0.1	file documents produced by defense counsel for opt-in deponent in opt-in's deposition folder
2/2/2016	JP	0.3	JP/ME review tasks needed to complete to comply with discovery order
2/2/2016	ME	0.1	download and save documents produced by defense counsel
2/2/2016	ME	0.3	telephone call from opt-in to complete [ ] about documents for discovery
2/2/2016	ME	0.3	JP/ME review tasks needed to complete to comply with discovery order
2/2/2016	ME	0.1	update opt-in's mailing address in client database
2/2/2016	MD	0.3	call to client about opting out 0.3
2/2/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#343 - ORDER granting [336] Plaintiffs' Motion to Compel, to be come effective on 3/18/16; signed by Judge Ronald B. Leighton.(DN)
2/2/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#342 - ORDER granting [341] Stipulated Motion: Plaintiffs' Deadline to Respond to Kellogg's Discovery Demands 3/1/16, Identify Affirmative Experts and Expert Reports (for certification and merits issues only) due 3/21/16, Fact Discovery completed by 4/18/2016, Identify Rebuttal Experts and Reports due by 4/18/2016, Expert Discovery Deadline (for certification and merits issues only) due 5/16/16; signed by Judge Ronald B. Leighton.(DN)
2/2/2016	MD	0.2	send clients emails about opting out 0.2
2/2/2016	ME	0.3	JP/ME meet to determine tasks that can be delegated for complying with discovery order
2/2/2016	MD	0.2	md/mr discussing updating damage calculations 0.2
2/2/2016	JF	0.2	JF/ME review task for determining which group opt-in's are in for complying with discovery order
2/2/2016	MR	0.2	md/mr discussing updating damage calculations 0.2
2/2/2016	ME	2.9	prepare opt-ins' documents for production to defense counsel by reviewing documents for responsiveness, redacting privilege information, and bates stamping
2/2/2016	CLER	0.3	create PDF format of documents recd from client (discovery documents)
2/3/2016	ME	0.1	file electronic copy of opt-in's deposition transcript
2/3/2016	MS	0.2	follow up on documents and depo preparation
2/3/2016	ME	0.1	email deposition transcript to opt-in for review
2/3/2016	MD	2.5	researching FLSA jury trial results 2.5
2/3/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)



Date	Staff	Amount of Time	Description
			JP/ME create list of tasks to complete to obtain remaining discovery information from
2/3/2016	ME	1 opt-ins	
2/3/2016	ME	0.1	file discovery documents sent by opt-in
2/3/2016	ME	0.1	email deposition trascript to opt-in for review
2/3/2016	ME	0.1	download opt-in's deposition transcript
2/3/2016	ME	0.3	update opt-in deponent files with documents recently produced by defense counsel
2/3/2016	MR	0.2	create and email static version of Kellogg summary page for MD
			create tracking spreadsheet and instructions for JF to work on project to determine category of opt-ins who have submitted a rog after defendant's created Exhibit A to
2/3/2016	ME	1	motion to compel opt-in discovery
			JP/ME create list of tasks to complete to obtain remaining discovery information from
2/3/2016	JP	1 opt-ins	
2/3/2016	MD	0.3	call with client about opting out 0.3
2/3/2016	ME	0.5	prepare opt-ins' discovery documents for production to defense counsel
2/4/2016	ME	0.1	save discovery documents sent by opt-in
2/4/2016	ME	0.1	reply to email from opt-in regarding contact information
2/4/2016	ME	0.1	telephone call with opt-in regarding completing [questions] for rog
2/4/2016	ME	0.1	email deposition transcript to opt-in for review
2/4/2016	ME	0.1	reply to opt-in's email regarding completing [questions] for rog
2/4/2016	ME	0.1	reply to email from opt-in regarding discovery documents
2/4/2016	ME	0.1	attempt to return opt-in's call regarding rog
2/4/2016	ME	0.5	review status of opt-ins who requested amended rog
2/4/2016	ME	0.1	reply to opt-in's email regarding discovery documents
2/4/2016	ME	0.1	reply to opt-in's email regarding sending discovery documents to our office
2/4/2016	ME	0.1	listen to voicemail from opt-in regarding rog
2/4/2016	ME	0.1	file opt-in's discovery documents on server
2/4/2016	MS	0.2	emails re Kellogg claimed deficiency in rog response
			compile list of opt-ins who fall into current employee category per handwritten
2/4/2016	ME	0.5	[questions] responses
2/4/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)
2/4/2016	MS	0.6	details for depo prep and defense
2/4/2016	ME	0.4	update opt-in discovery tracking spreadsheet to indicate opt-ins who have documents
2/4/2016	ME	0.4	edit draft letters to opt-ins regarding complying with discovery Order
			review opt-in [questions] responses to categorize opt-ins for purposes of contacting opt-
2/4/2016	ME	0.9	in regarding complying with discovery Order
2/4/2016	ME	0.1	file opt-in's deposition transcript on server
2/4/2016	ME	0.3	review status of opt-in discovery production
			prepare opt-in's discovery documents for production to defense counsel by reviewing
2/4/2016	ME	0.2	and bates stamping documents
2/4/2016	ME	0.1	reply to email from opt-in regarding discovery documents
2/4/2016	ME	0.1	save electronic copy of opt-in's deposition transcript
2/4/2016	ME	0.1	email copy of deposition to opt-in for review
2/4/2016	ME	0.1	reply to opt-in's email regarding discovery documents
			gather information needed to reply to opt-in's email .1; reply to opt-in's email regarding
2/4/2016	ME	0.2	question about discovery documents
2/4/2016	MD	1	md/mr discussing edits to damage calculations for mediation 1.0
2/4/2016	JF	0.1	Call to claimant to verify mailing address 0.1
2/4/2016	CLER	0.2	file hard copies of opt-in discovery documents

Date	Staff	Amount of Time	Description
2/4/2016	MR	1	md/mr discussing edits to damage calculations for mediation 1.0
2/4/2016	ME	0.3	create folders for hard copies of defendant deposition exhibits
2/4/2016	JP	0.1	JP/ME review process for providing documents to opt-in to review prior to deposition
2/4/2016	JF	0.9	Update contact information for Kellogg claimants 0.9
2/4/2016	ME	0.1	JP/ME review process for providing documents to opt-in to review prior to deposition
			begin creating lists of opt-ins from each category to receive letter regarding discovery
2/5/2016	ME	0.7	Order
			develop plan for sending letters to opt-ins who have not yet responded to discovery
2/5/2016	ME	0.9	requests
2/5/2016	ME	0.1	email deposition transcript to opt-in for review
2/5/2016	MR	0.1	MR/ME discuss status of exluded opt-in
2/5/2016	ME	0.2	bates stamp opt-in's documents to preapre for production to defense counsel
			update opt-in discovery tracking spreadsheet to indicate those people who responded to recent [questions] regarding complying with Order in order to compile list of people who
2/5/2016	ME	1.4	need to be sent a letter
			update opt-in's category in discovery tracking spreadsheet for those who were unclear at
2/5/2016	ME	0.4	the time emails were sent
			update opt-in discovery tracking spreadsheet to indicate those opt-ins who recently
2/5/2016	ME	0.3	completed [questions] for rog
2/5/2016	ME	0.5	update categories of opt-ins who need to complete discovery in tracking spreadsheet
			MR/ME review process for compiling list of opt-ins who need letter regarding responding
2/5/2016	MR	0.2	to discovery Order
			MR/ME review process for compiling list of opt-ins who need letter regarding responding
2/5/2016	ME	0.2	to discovery Order
2/5/2016	ME	0.6	edit draft letters to opt-ins regarding complying with discovery Order
2/5/2016	ME	0.2	ME/MR discuss tracking going forward of rogs and docs produced
2/5/2016	ME	0.4	review opt-in's documents
2/5/2016	MR	0.2	ME/MR discuss tracking going forward of rogs and docs produced
			review defendant deposition transcripts received via cd to ensure electronic copies have
2/5/2016	ME	0.2	been saved
2/5/2016	JF	0.1	Call to claimant to verify email address 0.1
2/5/2016	ME	0.1	download and file opt-ins' deposition transcripts
2/5/2016	ME	0.1	scan opt-in's discovery documents
2/5/2016	JF	0.9	Update contact information for Kellogg claimants 0.9
2/5/2016	ME	0.1	MR/ME discuss status of exluded opt-in
2/5/2016	JF	2.1	Update contact information for Kellogg claimants 2.1
2/5/2016	ME	0.1	reply to opt-in's email regarding contact information
2/5/2016	ME	0.1	email deposition transcript to opt-in for review
2/5/2016	JF	0.1	Call to claimant regarding mailing address 0.1
			read through email exchange of JP, MD and DG about Kellogg planned change in practice
2/7/2016	MR	0.2	for DSD
2/8/2016	JP	0.3	JLP/JF Review the task to send letters to non-responsive claimants 0.3
			prepare letter and list of recipients for one category of opt-in's who have not responded
2/8/2016	JP	0.7	to rog
2/8/2016	ME	0.4	review defendant's reply to plt's response to motion to compel
2/8/2016	JP	0.6	JP/ME review plan for sending letters to discovery nonresponders

Date	Staff	Amount of Time	Description
2/8/2016	ME	0.7	prepare letter and list of recipients for one category of opt-in's who have not responded to rog
2/8/2016	ME	0.2	review [questions] responses to determine new responses since last week
2/8/2016	ME	0.2	reply to opt-in's email regarding discovery documents
2/8/2016	AG	0.3	review ltr to clients with spreadsheet (confirm amount and addresses)
2/8/2016	ME	0.1	review status of [questions] responses for discovery Order
2/8/2016	JP	1	JP/ME prepare to call list for remaining two categories of opt-ins who need to be contacted regarding responding to discovery Order
2/8/2016	ME	0.1	update opt-in discovery tracking spreadsheet to reflect new [questions] responses
2/8/2016	ME	1	JP/ME prepare to call list for remaining two categories of opt-ins who need to be contacted regarding responding to discovery Order
2/8/2016	ME	0.1	update tracking spreadsheet regarding defedant's exhibit A with notes about opt-ins who did not receive bulk emails
2/8/2016	ME	0.5	review trackingsheet for opt-in discovery to determine list of recipients for different categories of opt-ins who are receiving a letter regarding discovery Order
2/8/2016	MR	4.2	Investigate records of excluded opt-ins, identify numerous excluded opt-ins with valid state claims, compose and email writeup of results to team
2/8/2016	MD	0.3	dg/md/jp discuss settlement status .1; discuss discovery supplement status .2
2/8/2016	JP	0.2	dg/md/jp discuss discovery supplement status .2
2/8/2016	ME	0.2	download and save [questions] responses for [questions] created to obtain remaining discovery per Order
2/8/2016	JP	0.5	JP/ME prepare letter and recipient list for one category of opt-ins who will receive letter regarding responding to discovery Order
2/8/2016	ME	0.1	telephone call from opt-in regarding question about [questions] for discovery
2/8/2016	ME	0.2	update opt-in discovery tracking spreadsheet to indicate people who recently confirmed they have no documents
2/8/2016	ME	0.5	JP/ME prepare letter and recipient list for one category of opt-ins who will receive letter regarding responding to discovery Order
2/8/2016	JF	0.3	JLP/JF Review the task to send letters to non-responsive claimants 0.3
2/8/2016	JF	3.2	Send letters to non-responsive claimants in the lawsuit 3.2
2/8/2016	ME	0.1	respond to email from opt-in regarding discovery information
2/8/2016	JK	1.3	JK review extrapolations in regards to state based extrapolations from time of complaint date
2/8/2016	ME	0.4	review defendant's motion to compel opt-in discovery responses to ensure letters are sent accordingly
2/8/2016	ME	0.1	review discovery status of opt-in and attempts to contact
2/8/2016	DG	0.3	dg/md/jp discuss settlement status .1; discuss discovery supplement status .2
2/8/2016	ME	0.6	JP/ME review plan for sending letters to discovery nonresponders
2/8/2016	JF	0.2	Update contact information for Kellogg claimants 0.2
2/8/2016	CLER	0.1	create PDF format of document recd from client (resume)
2/9/2016	KW	0.3	telephone call to schedule interview to gather infomation needed to respond to discovery demands .1 add information to tracking spreadsheet .1 update case notes .1
2/9/2016	ME	2.5	DG/MD/MR/JP/ME discuss mediation risks and updated settlement spreadsheet to prepare for mediation

Date	Staff	Amount of Time	Description
2/9/2016	JP	0.7	JLP/KW review discovery demands requiring a response .2 review list of plaintiffs for whom we need a response .1 review [questionnaire] required [questions] to be completed and discuss responses needed .2 determine most efficient process going forward to track responses and document production .2
2/9/2016	JK	0.6	JK calculate average state damages for each state outside the FLSA limitation period for half time damage calculations
2/9/2016	KW	0.4	interview to complete information needed to respond to discovery requests .2 update case notes .1 add information to Tracking spreadsheet .1
2/9/2016	KW	0.7	JLP/KW review discovery demands requiring a response .2 review list of plaintiffs for whom we need a response .1 review [questionnaire] required [questions] to be completed and discuss responses needed .2 determine most efficient process going forward to track responses and document production .2
2/9/2016	KW	0.4	interview to complete information needed to respond to discovery requests .2 update case notes .1 add information to Tracking spreadsheet .1
2/9/2016	KW	0.3	telephone call to schedule interview to gather information needed to satisfy discovery demands .1 update case notes .1 add information to Tracking spreadsheet .1
2/9/2016	KW	0.2	telephone call to schedule interview to gather needed information to respond to discovery demands .1 add information to case notes .1
2/9/2016	ME	0.1	save electronic copy of opt-in's discovery document that was sent via fax
2/9/2016	ME	0.4	locate opt-ins to receive letter regarding discovery Order with incomplete information
2/9/2016	MR	4.1	begin analysis of Motus data with regard to drive time and potential extrapolation of average workday 2.8; compare excel Logan Groulx study results 2010 1.3
2/9/2016	ME	0.1	telephone call in response to voicemail regarding wrong number for opt-in
2/9/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)
2/9/2016	MD	0.1	emailing defense counsel about release date and relation back issue for mediation 0.1
2/9/2016	MS	0.5	review docs for depo prep
2/9/2016	KW	0.4	interview to gather information to respond to discovery requests .2 add information to tracking spreadsheet .1 update case notes .1
2/9/2016	KW	0.4	interview to gather information to respond to discovery requests .2 add information to tracking spreadsheet .1 update case notes .1
2/9/2016	JK	0.8	JK/MR review of methodology for dealing with FLSA CTS dates and state class plea dates
2/9/2016	KW	0.4	interview to complete information needed to respond to defnednat's discovery demands .2 add information to tracking spreadsheet .1 update case notes .1
2/9/2016	JK	0.6	JK calculate average state damages for each state outside the FLSA limitation period for 1.5 time damage calculations
2/9/2016	KW	0.3	telephone call to gather information to respond to discovery demands .1 add information to case notes .1 update tracking spreadsheet .1
2/9/2016	JK	0.6	JK/MR inspection of issue in damage calculation spreadsheet relating to plea date and consent to sue date
2/9/2016	KW	0.4	interview to gather information to respond to defendant's discovery demands .2 add information to tracking spreadsheet .1 update case notes .1
2/9/2016	ME	0.7	review opt-ins who were not included in bulk email to determine who should and should not receive letter regarding discovery Order

Date	Staff	Amount of Time	Description
2/9/2016	MR	0.6	JK/MR inspection of issue in damage calculation spreadsheet relating to plea date and consent to sue date
2/9/2016	MR	0.8	JK/MR review of methodology for dealing with FLSA CTS dates and state class plea dates
2/9/2016	JK	0.4	JK/MR review Defendant email which discusses Plaintiff extrapolation methodology.
2/9/2016	MD	0.1	email defense counsel re extrapolation data 0.1
2/9/2016	KW	0.4	interview to gather information needed to espond to discovery requests .2 update case notes .1 add information to Tracking spreadsheet .1
2/9/2016	CLER	0.2	prepare FedEx label for client (Documents for discovery)
2/9/2016	KW	0.4	research contact information list of plaintiffs who need to complete [questions] to satisfy defendant's discovery demands .3 update tracking spreadsheet .1
2/9/2016	JP	2.5	DG/MD/MR/JP/ME discuss mediation risks and updated settlement spreadsheet to prepare for mediation
2/9/2016	MR	2.5	DG/MD/MR/JP/ME discuss mediation risks and updated settlement spreadsheet to prepare for mediation
2/9/2016	MD	2.5	DG/MD/MR/JP/ME discuss mediation risks and updated settlement spreadsheet to prepare for mediation
2/9/2016	ME	0.3	JP/ME determine information regarding discovery Order to be discussed with attorneys
2/9/2016	JK	0.6	JK calculate average state damages for each state outside the FLSA limitation period for hybrid method damage calculations
2/9/2016	DG	2.5	DG/MD/MR/JP/ME discuss mediation risks and updated settlement spreadsheet to prepare for mediation
2/9/2016	ME	0.5	MR/ME/JP determine best process for tracking opt-in responses to [questions] for discovery Order
2/9/2016	ME	0.1	save opt-in's discovery document sent via mail
2/9/2016	JK	1.1	JK Review of extrapolations in reference to outer bounds dates of gap analysis
2/9/2016	MR	0.5	MR/ME/JP determine best process for tracking opt-in responses to [questions] for discovery Order
2/9/2016	ME	0.3	update opt-in discovery tracking spreadsheet to indicate opt-ins from group 4 who confirmed they have no documents
2/9/2016	JP	0.5	MR/ME/JP determine best process for tracking opt-in responses to [questions] for discovery Order
2/9/2016	MD	0.1	email jp/me re scheduling deposition of opt-in 0.1
2/9/2016	JK	1.6	JK create new matrix of payroll history which includes earlier dates
2/9/2016	MR	2.7	investigate problem with relation back computations for opt-ins and class in damage calculations 1.0, revise and test equations in damage calculations for relation back 1.7
2/9/2016	KW	0.6	interview to complete [questions] to gather information to respond to discovery demands .4 add inormation to case notes .1 update tracking spreadsheet .1
2/9/2016	ME	0.1	complete [questions] for discovery Order with opt-in over the phone
2/9/2016	CLER	0.2	prepare FedEx label for client (Documents for discovery)
2/9/2016	ME	0.2	telephone call from opt-in regarding update .1; notes from conversation .1
2/9/2016	ME	0.5	update tracking spreadsheet to indicate opt-ins from group 5 who have confirmed they have no discovery documents
2/9/2016	ME	0.1	save electronic copy of opt-in's deposition transcript

Date	Staff	Amount of Time	Description
2/9/2016	MD	0.1	email local counsel about speaking re risks in case for purposes of mediation 0.1
2/9/2016	JF	3.2	Send letters to claimants in the lawsuit regarding documents 3.2
2/9/2016	KW	0.4	Interview to gather information to complete responses to discovery demands .2 update case notes .1 add information to Tracking spreadsheet .1
2/9/2016	ME	0.2	review status of opt-in [questions] responses for discovery Order
2/9/2016	KW	0.4	interview to complete information needed to respond to discovery demands .2 add information to tacking spreadsheet .1 update case notes .1
2/9/2016	KW	0.4	interview to gather information to respond to defendant's discovery demands .2 add information to tracking spreadsheet .1 update case notes .1
2/9/2016	ME	0.1	email deposition transcript to opt-in for review
2/10/2016	ME	0.2	telephone call with opt-in to complete [questions] for discovery and provide case update
2/10/2016	JK	2.1	JK Calculate missing weeks in isolated relation back weeks
2/10/2016	JK	0.9	JK matched up missing weeks in relation back period to weeks that have already been produced in payroll
2/10/2016	JK	1.1	JK Isolate payroll history in relation back period
2/10/2016	MR	2.8	review in depth progress on extrapolation updates worked on by JK 2.5, consider next steps for updated extrapolations .3
2/10/2016	JP	1.5	DG/MD/MR/JP/ME determine mediation risk calculations to prepare for mediation
2/10/2016	MD	1.5	DG/MD/MR/JP/ME determine mediation risk calculations to prepare for mediation
2/10/2016	MR	3.1	continued work on Motus data/Groulx study analysis, examining earlier groulx studies 1.5, complete Motus/Groulx analysis 1.0, compose and email writeup to team .6
2/10/2016	DG	1.5	DG/MD/MR/JP/ME determine mediation risk calculations to prepare for mediation
2/10/2016	MR	1.5	DG/MD/MR/JP/ME determine mediation risk calculations to prepare for mediation
2/10/2016	JP	0.5	JP/MR discuss and create litigation risk discounted damages chart and review damages model
2/10/2016	ME	0.3	determine plan needed for each category of opt-ins who have confirmed they have no discovery documents
2/10/2016	ME	0.1	telephone call with opt-in regarding case update
2/10/2016	JK	1.8	JK adjust modified modified payroll history dates to match dates in missing weeks extrapolations
2/10/2016	JK	1.3	JK review missing weeks extrapolations and payroll history
2/10/2016	CLER	1.9	create PDF format of documents recd from client (discovery documents)
2/10/2016	MR	0.6	JP/MR review motus/groulx and other case issues .6
2/10/2016	ME	1.9	update opt-in discovery tracking spreadsheet to reflect [questions] responses .5; determine action needed for group of opt-ins who responded to [questions] .9; analyze data .5
2/10/2016	ME	0.2	listen to voicemail from opt-in regarding [questions] for discovery .1; check tracking spreadsheet and previous contact to determine opt-in's discovery status .1
2/10/2016	ME	0.3	telephone call from opt-in to complete [questions] for discovery
2/10/2016	JK	0.8	JK create new matrix of leave of absense weeks which includes relation back weeks
2/10/2016	CLER	0.1	create PDF format of correspondence from JAMS (mediation confirmation)



Date	Staff	Amount of Time	Description
2/10/2016	JK	0.8 weeks	JK create new matrix of payroll history of payroll history which includes relation back
2/10/2016	JP	0	JP/MR review motus/groulx and other case issues .6
2/10/2016	MD	0.5	call with defense counsel about extrapolation data 0.5
2/10/2016	ME	0.5	MD/JP/ME review discovery documents for mediation .2; discuss status of opt-in discovery .3
2/10/2016	ME	0.3	review status of opt-in [questions] responses for discovery
2/10/2016	JP	0.6	JP/MR review motus/groulx and other case issues .6
2/10/2016	ME	1.5	DG/MD/MR/JP/ME determine mediation risk calculations to prepare for mediation
2/10/2016	MR	0.5	JP/MR discuss and create litigation risk discounted damages chart and review damages model
2/10/2016	MD	0.5	MD/JP/ME review discovery documents for mediation .2; discuss status of opt-in discovery .3
2/10/2016	ME	0.2	draft email to FLSA excluded opt-ins with state claims
2/10/2016	JP	0.5	MD/JP/ME review discovery documents for mediation .2; discuss status of opt-in discovery .3
2/11/2016	KW	0.3	attempts to contact via phone to gather information needed to respond to defendant's discovery requests .1 draft and send email explaining discovery demands and need to respond .1 add information to case notes .1
2/11/2016	ME	0.1	telephone call from opt-in regarding discovery
2/11/2016	KW	0.4	attempt to contact plaintiffs to gather information needed to satisfy discovery demands .2 add information to tracking spreadsheet .1 add information to case notes .1
2/11/2016	MR	1.5	work on project to compare extrap 2 with Def pto data
2/11/2016	KW	0.6	telephone call to schedule appointment for interview to gather information needed to respond to defendant's discovery demands .1 draft email explaining information needed and court requirement to respond or possible lose claims .2 email to plaintiff .1 add information to Tracking spreadsheet .1 update case notes .1
2/11/2016	MR	1.3	examine past emails about willard bishop study and other DSD case results
2/11/2016	KW	0.3	attempted to contact plaintiff to gather informaton needed to satisfy defendant's discovery demands .1 add information to Tracking spreadsheet .1 update case notes .1
2/11/2016	JK	0.2	JK/JP/ME review technical issue with spreadsheet for tracking different categories of opt-ins from defendant's Exhibit A
2/11/2016	JP	0.2	JK/JP/ME review technical issue with spreadsheet for tracking different categories of opt-ins from defendant's Exhibit A
2/11/2016	JK	2.8	JK Begin spreadsheet analysis of the class vs FLSA damage weeks(1.6) and relation back vs state plea date weeks (1.2)
2/11/2016	CLER	6	create PDF format of documents recd from client (discovery documents)
2/11/2016	JK	1.3 weeks	JK Add state damages to extrapolation weeks that fall outside FLSA or are class memeber
2/11/2016	KW	0.4	review spreadsheets of plaintiffs for whom we need additional information and or documents to determine who needs to be contacted .1 determine which plaintiffs require additional information to determine claims .1 draft emai of information to lead paralegal .1 organize contact information to gather information needed to satisfy defendant's discovery demands .1
2/11/2016	ME	3.4	perform search of emails produced by defense counsel to prepare documents for mediation

Date	Staff	Amount of Time	Description
2/11/2016	MR	0.3	DG/MR discuss damage components and discounts and relate issues of case
2/11/2016	MD	0.2	review email from defense counsel about extrapolation data for mediation 0.2
2/11/2016	KW	0.4	interview to gather information needed to satisfy defendant's discovery requests .2 update case notes .1 add information to Tracking spreadsheet .1
2/11/2016	ME	2.3	review opt-ins' [questions] responses and update tracking spreadsheet for opt-in discovery
2/11/2016	KW	0.3	completed gathering information needed to satisfy discovery requests .1 add information to tracking spreadsheet .1 update contact information in case notes .1
2/11/2016	JP	0.3	JLP/KW confer regarding responses to plaintiffs regarding claims .1 review claims sheet and plaintiff information to determine work to be accomplished .2
2/11/2016	ME	0.1	telephone call regarding opt-in's discovery
2/11/2016	MR	0.2	MR/KW discuss information needed and information to be shared with plaintiffs with complicated claims .2
2/11/2016	JK	0.2	JK/MR discuss two emails we received suggesting Kellogg planning change in practice .1, discuss call with Def Counsel about extrapolations .1
2/11/2016	KW	0.5	interview to gather information needed to respond to defendant's discovery requests .2 update case notes .1 add information to Tracking spreadsheet .1 email to plaintiff with information needed to forward documents to our office .1
2/11/2016	JK	0.1	JK/MR discuss some details on extrapolation work done by JK
2/11/2016	KW	0.1	update case notes regarding job application and documents
2/11/2016	MR	0.3	MR/ME review claim status of opt-in
2/11/2016	DG	0.3	DG/MR discuss damage components and discounts and relate issues of case
2/11/2016	KW	0.1	update address in contact information .1
2/11/2016	MR	0.5	look up estimated settlement amounts for excluded clients on list who have state claims
2/11/2016	ME	0.2	telephone call with opt-in regarding discovery documents
2/11/2016	ME	0.3	MR/ME review claim status of opt-in
2/11/2016	ME	0.2	JK/JP/ME review technical issue with spreadsheet for tracking different categories of opt-ins from defendant's Exhibit A
2/11/2016	ME	0.2	save documents in mediation folder
2/11/2016	KW	0.4	attempt to establish contact with plaintiff to respond to defendant's discovery demands .1 send explaining discovery requirements and possible consequences of non-compliance .1 add information to Tracking spreadsheet .1 update case notes .1
2/11/2016	KW	0.4	respond to emailed questions from plaintiff [ ] .2 update case notes .1 forward documents provided by plaintiff to lead paralegal for review and production to defendant .1
2/11/2016	KW	0.2	Complete [questions] information needed to respond to defendant's discovery demands .2
2/11/2016	MR	0.5	review prior emails regarding info on client's very detailed work hour records .2, send out email to team about same .1, review other prior stats on Kellogg damages .2
2/11/2016	ME	0.2	JP/ME review damage calculations
2/11/2016	MR	0.1	ME/MR check-in on need for mail merge of rogs and docs tracking .1
2/11/2016	DG	0.3	dg/mr discuss new info re extrapolations for settlement .3
2/11/2016	MD	0.1	email with JP about deposition dates of opt-ins 0.1
2/11/2016	MR	0.3	dg/mr discuss new info re extrapolations for settlement .3

Date	Staff	Amount of Time	Description
2/11/2016	KW	0.3	attempt to contact plaintiff to gather information to satisfy defendant's discovery requests .1 update case notes .1 add information to Tracking spreadsheet .1
2/11/2016	ME	0.1	ME/MR check-in on need for mail merge of rogs and docs tracking .1
2/11/2016	MR	0.3	JP/MR confer on information related to litigation risk discounts of damage calcs .3
2/11/2016	JP	0.2	JP/ME review damage calculations
2/11/2016	KW	0.3	Complete [questions] to provide information needed to satisfy discovery demands .2 add information to case notes .1
2/11/2016	MR	0.3	read email from Def Counsel on extrapolations .1, email two replies to team regarding Def Counsel email .2
2/11/2016	JK	0.8	JK isolate extarpolation weeks that are state damage weeks
2/11/2016	KW	0.2	MR/KW discuss informtion needed and information to be shared with plaintiffs with complicated claims .2
2/11/2016	JK	0.2	MD/JK Discuss extrapolation relation back dates as it relates to missing weeks extrapolations
2/11/2016	MR	0.2	JK/MR discuss two emails we received suggesting Kellogg planning change in practice .1, discuss call with Def Counsel about extrapolations .1
2/11/2016	KW	0	gathered information to complete discovery rquests .2 add information to case notes .1 update Tracking spreadsheet .1
2/11/2016	JK	0.8	JK isolate extarpolation weeks that are FLSA Weeks
2/11/2016	KW	0.3	JLP/KW confer regarding responses to plaintiffs regarding claims .1 review claims sheet and plaintiff information to determine work to be accomplished .2
2/11/2016	KW	0.3	complete information gathering needed to respond to defendant's discovery demands .2 send email regarding document search and production .1
2/11/2016	MD	0.2	MD/JK Discuss extrapolation relation back dates as it relates to missing weeks extrapolations
2/11/2016	MD	0.2	MD/JK Discuss extrapolation date range
2/11/2016	KW	0.3	attempt to contact plaintiff to gather information to satisfy defendant's discovery requests .1 update case notes .1 add information to Tracking spreadsheet .1
2/11/2016	JK	1.1	JK isolate extarpolation weeks that are within the relation back time period
2/11/2016	JP	0.3	JP/MR confer on information related to litigation risk discounts of damage calcs .3
2/11/2016	KW	0.4	INTERVIEW TO GATHER INFORMATION NEEDED TO RESPOND TO DISCOVERY DEMANDS .2 ADD INFORMATION TO CASE NOTES .1 UPDATE TRACKING SPREADSHEET .1
2/11/2016	KW	0.1	draft and send email to establish contact with plaintiff to complete information needed to satisfy discovery demands .1
2/11/2016	KW	0.4	interview with plaintiff [ ] to gather information to satisfy defendant's discovery demands .2 update case ntoes .1 add informationto Tracking spreadsheet .1
2/11/2016	JK	0.2	MD/JK Discuss extrapolation date range
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	MD	0.1	MD/CM discuss adding additional estimated costs for mediation (.1)
2/12/2016	JP	0.3	JP/JF Review task to call claimants regarding [questions] completion 0.3
2/12/2016	JF	0.2	Contact claimant regarding [questions] completion 0.2
2/12/2016	JF	0.4	Complete Interrogatory with claimant over the phone 0.4
2/12/2016	JF	0.1	Send email to claimant regarding [questions] completion 0.1

Date	Staff	Amount of Time	Description
2/12/2016	JP	0.4	JP/ME discuss information needed for mediation
			call with attorney who litigated against Kellogg and defense counsel for purposes of
2/12/2016	MD	0.5	mediation 0.5
2/12/2016	CLER	0.1	Data Entry of updated contact information
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	ME	0.1	produce opt-in documents to defense counsel for opt-in depositions
2/12/2016	JP	0.2	MR/JP/ME review process for completing opt-in discovery
2/12/2016	ME	0.1	telephone call from opt-in regarding discovery
2/12/2016	ME	0.9	prepare opt-in documents for production by reviewing and bates stamping
2/12/2016	MD	0.5	call with local counsel about risks in case
2/12/2016	CM	0.1	MD/CM discuss adding additional estimated costs for mediation (.1)
2/12/2016	ME	0.4	JP/ME discuss information needed for mediation
2/12/2016	ME	0.2	MR/JP/ME review process for completing opt-in discovery
2/12/2016	ME	0.1	telephone call with opt-in regarding case update
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	JF	0.2	Call to claimant regarding [questions] completion 0.2
2/12/2016	ME	0.1	email [questions] for discovery to opt-in
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	JF	0.4	Complete [questions] over the phone 0.4
2/12/2016	JF	0.3	JP/JF Review task to call claimants regarding [questions] completion 0.3
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
			perform web research for possible DSD experts .4, perform web research on severance waiver .2, perform web research and read over kehe, hersey and other case discussions
2/12/2016	MR	1	.2, send two emails to para JP regarding research .2
2/12/2016	ME	0.1	file discovery documents received from opt-ins
2/12/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)
			JK create totals page which breaks down all extrapolations totals into subsets: relation
2/12/2016	JK	2.7	back period, State Damage period (From state plea date), and FLSA damages 2.7
2/12/2016	CM	0.2	add costs to spreadsheet (.2)
2/12/2016	CLER	0.8	print and file documents for mediation
2/12/2016	JF	0.1	Email claimant regarding contact information 0.1
2/12/2016	JP	0.3	JP/ME discuss tasks needed regarding contacting opt-ins about discovery
2/12/2016	ME	0.1	email opt-in regarding discovery
2/12/2016	ME	0.3	JP/ME discuss tasks needed regarding contacting opt-ins about discovery
2/12/2016	ME	2.6	review defendant's production
2/12/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)
2/12/2016	ME	0.1	telephone call from opt-in regarding case update
2/12/2016	JP	0.2	MR/MD/JP/ME discuss preparation needed for mediation
2/12/2016	JF	0.2	Email claimant regarding [questions] completion 0.2
2/12/2016	ME	0.2	MR/MD/JP/ME discuss preparation needed for mediation
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	MR	0.2	MR/JP/ME review process for completing opt-in discovery
2/12/2016	CM	0.5	update case costs for mediation (.5)
2/12/2016	ME	0.8	review and print defendant documents for use in mediation
2/12/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)
2/12/2016	JK	0.6	JK review damages risk assessment with team via email
2/12/2016	CM	0.9	update case fees for mediation (.9)
2/12/2016	MD	0.2	MR/MD/JP/ME discuss preparation needed for mediation

Date	Staff	Amount of Time	Description
2/12/2016	ME	0.1	telephone call from opt-in regarding case update
2/12/2016	MR	0.2	MR/MD/JP/ME discuss preparation needed for mediation
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	MR	0.5	JP/MR phone call confer about new issues with damages .5
2/12/2016	CLER	0.1	Data Entry of updated contact information
2/12/2016	MR	0.1	create reminder to prep laptops for mediation
2/12/2016	CLER	0.1	Data Entry of updated contact information
2/12/2016	MD	2.5	conducting legal research for mediation 2.5
2/12/2016	MR	0.1	email to CM about billing entries and need for estimates for today and going forward
2/12/2016	MR	0.3	prep hard drive with encrypted case files for tomorrow depo
2/12/2016	JP	0.5	JP/MR phone call confer about new issues with damages .5
			perform various tests on damage calcs to see impact of litigation risks and hours worked
			adjustments on client awards 1.6, compose email to team explaining some results of
			these tests .3, compose email to team regarding impact of severance discount set to full
2/12/2016	MR	2.1	discount .2
			JKbreak snacks gap extrapolation totals into class and opt-in subtotals for extrapolation
2/12/2016	JK	0.8	type 1
2/12/2016	JF	0.1	Email claimant regarding [questions] completion 0.1
2/12/2016	MR	0.1	ME/MR discuss whether Def produced any severance agreements
2/12/2016	JF	0.2	Call to claimant regarding [questions] completion 0.2
			JK break snacks gap extrapolation totals into class and opt-in subtotals for extrapolation
2/12/2016	JK	0.8	type 2
2/12/2016	JK	0.1	JK/MR discuss Def counsel email from last night
2/12/2016	JK	0.4	JK/MR review gap analysis spreadsheet in prep for mediation
2/12/2016	ME	0.2	telephone call with opt-in to complete [questions] for discovery
			JK break snacks gap extrapolation totals into class and opt-in subtotals for extrapolation
2/12/2016	JK	0.8	type 3
2/12/2016	AG	0.3	prepare remailing to clients (RTS mailing with updated addresses)
2/12/2016	ME	0.1	telephone call with opt-in regarding case update
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/12/2016	MR	0.1	JK/MR discuss Def counsel email from last night
2/12/2016	JP	0.5	dg/jp discuss settlement risk discounts .5
2/12/2016	DG	3.3	dg/mr travel to Philly for mediation 3.3
2/12/2016	JF	0.1	Update claimant's information in TM 0.1
2/12/2016	ME	0.1	ME/MR discuss whether Def produced any severance agreements
2/12/2016	DG	0.3	book hotel rooms for mediation .3
2/12/2016	MR	0.4	JK/MR review gap analysis spreadsheet in prep for mediation
2/12/2016	DG	0.5	dg/jp discuss settlement risk discounts .5
2/12/2016	MR	3.3	dg/mr travel to Philly for mediation 3.3
2/13/2016	MD	9.3	attend mediation 9.3
2/13/2016	MR	13.5	mediation 9-10 prep; 10-7:30 mediation 7:00-10:30 return travel 3.5
2/13/2016	DG	13.5	mediation 9-10 prep; 10-7:30 mediation 7:00-10:30 return travel 3.5
2/13/2016	MD	6.5	travel to and from mediation 6.5
2/14/2016	MR	2.4	research litigation risk analysis for deeper examination of risk discounts to case
2/14/2016	MD	0.5	call deponents about rescheduling depositions 0.5
			work on updating mediation calcs 2.0, test some of the litigation risk equations .7,
2/14/2016	MR	4.4	research other RSR cases 1.7

Date	Staff	Amount of Time	Description
2/16/2016	ME	0.1	JP/ME discuss results of mediation
2/16/2016	ME	0.5	[compile] new [questions] results for opt-in discovery .2; add full responses to the tracking sheet for each [questions] .3
2/16/2016	KW	0.3	forward email regarding document search to lead paralegal with explanation of contacts .1 update tracking spreadsheet .1 add information to case notes .1
2/16/2016	MR	5.7	research Kellogg public financial disclosures and stock price trend 1.3, send two emails to team about Kellogg financials .3, analyze sample plaintiff claims using current offer and discounts for straight time recovery and half-time recovery 3.0, send detailed email to team about sample recovery analysis .4, test remaining litigation risk discount equations in calculations .7
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	CLER	0.1	create PDF format of correspondence recd from Price Chopper (respond to subpoena)
2/16/2016	JF	0.4	Produce Fedex label for claimant to mail responsive documents to us 0.4
2/16/2016	CLER	0.3	Prepare Fedex label for claimant to mail his responsive documents 0.3
2/16/2016	MD	0.2	MD/DG/KW debrief regarding results of mediation session .2
2/16/2016	ME	0.1	telephone call from opt-in regarding case update
2/16/2016	DG	0.2	MD/DG/KW debrief regarding results of mediation session .2
2/16/2016	JF	0.2	Call to claimant regarding documents 0.2
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	AG	0.2	prepare notice of withdrawal of consent to sue
2/16/2016	KW	0.5	telephone call to plaintiff to discuss document search and to determine best way for him to get material to our office .2 add information to case notes .1 update Tracking spreadsheet .1 email FEDX shipping label to plaintiff .1
2/16/2016	ME	0.2	MD/ME provide update about results of mediation
2/16/2016	JF	0.3	Call to claimant regarding documents 0.3
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	JF	0.3	Call to claimant regarding documents 0.3
2/16/2016	JF	0.2	Call to claimant regarding documents 0.2
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	MD	0.2	MD/ME provide update about results of mediation
2/16/2016	CLER	0.2	prepare FedEx label for client (Documents for discovery)
2/16/2016	ME	0.1	reply to opt-in's email regarding discovery
2/16/2016	JP	0.1	JP/ME discuss results of mediation
2/16/2016	KW	0.3	respond to email from plaintiff regarding document production .1 add information to case notes .1 update Tracking spreadsheet .1
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	ME	0.3	review opt-ins' documents for responsiveness
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	JF	0.2	Call to claimant regarding documents 0.2
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	ME	2.9	update master tracking spreadsheet for opt-in discovery to indicate newly received [questions] responses and information about documents
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	JF	0.3	Call to claimant requesting documents 0.3
2/16/2016	KW	0.3	review documents sent by plaintiff .1 email response and questions to plaintiff .1 update case notes .1
2/16/2016	KW	0	telephone call to plaintiff to verify he had completed a diligent search for documents to satisfy defendant's discovery demands ..1 add information to case notes .1 email to lead paralegal .1



Date	Staff	Amount of Time	Description
2/16/2016	CLER	0.3	Prepare Fedex label for claimant to mail responsive documents to us 0.3
2/16/2016	ME	0.2	file electronic copies of defendant transcripts
2/16/2016	CLER	0.5	create PDF format of documents recd from client (discovery documents)
2/16/2016	DG	0.3	review emails from team re mediation position and challenges ahead .3
2/16/2016	JF	0.1	Call to claimant regarding documents 0.1
2/16/2016	KW	0.2	MD/DG/KW debrief regarding results of mediation session .2
2/16/2016	KW	0.3	attempt to contact plaintiff regarding information needed and document search .1 add information to case notes .1 update Tracking spreadsheet .1
2/16/2016	JF	0.4	Call to claimant regarding documents 0.4
2/16/2016	ME	0.1	MD/ME review status of opt-in discovery
2/16/2016	AG	0.1	ECF Filing of Stipulated MOTION To Stay Case Pending Mediation And Continue Court Deadlines For Additional Two Weeks And [Proposed] Order
2/16/2016	JF	0.3	Call to claimant regarding documents 0.3
2/16/2016	JF	0.4	Take [questions] regarding responsive documents over the phone 0.4
2/16/2016	AG	0.1	ECF Filing of NOTICE of Withdrawal of Consent to Sue of Devens
2/16/2016	ME	0.2	email MD regarding amended rogs needed for opt-ins
2/16/2016	MD	0.1	MD/ME review status of opt-in discovery
2/17/2016	ME	1.4	DG/MD/MR/JP/ME debrief re mediation outcome .3; review risk assessment to prepare for next mediation 1.1
2/17/2016	JP	1.4	DG/MD/MR/JP/ME debrief re mediation outcome .3; review risk assessment to prepare for next mediation 1.1
2/17/2016	ME	0.2	bates stamp opt-in's discovery documents to prepare for production to defense counsel
2/17/2016	JF	0.8	Review [questions] with claimant over the phone 0.8
2/17/2016	JF	0.1	Call to claimant regarding documents 0.1
2/17/2016	DG	1.4	DG/MD/MR/JP/ME debrief re mediation outcome .3; review risk assessment to prepare for next mediation 1.1
2/17/2016	JF	0.1	JF/ME review opt-in's [questions] responses for rog
2/17/2016	MD	1.4	DG/MD/MR/JP/ME debrief re mediation outcome .3; review risk assessment to prepare for next mediation 1.1
2/17/2016	MR	1.4	DG/MD/MR/JP/ME debrief re mediation outcome .3; review risk assessment to prepare for next mediation 1.1
2/17/2016	DG	1.2	review scholarly articles re risk methodology re accuracy of our damage calculations 1.2
2/17/2016	ME	1.1	JP/ME review status of opt-in discovery and tasks needed to complete
2/17/2016	JP	1.1	JP/ME review status of opt-in discovery and tasks needed to complete
2/17/2016	JF	0.1	Call to claimant regarding documents 0.1
2/17/2016	MR	0.2	MR/ME discuss process for responding to Order to compel opt-in discovery
2/17/2016	JF	0.3	Produce Fedex label to mail the claimant for responsive documents 0.3
2/17/2016	ME	0.1	left voicemail for opt-in regarding discovery
2/17/2016	ME	0.1	JF/ME review opt-in's [questions] responses for rog
2/17/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#345 - Stipulated MOTION To Stay Case Pending Mediation And Continue Court Deadlines For Additional Two Weeks And [Proposed] Order by Plaintiff Patty Thomas. (Dunn, Matt)
2/17/2016	ME	0.7	read information to inform process for moving forward with risk assessment for mediation
2/17/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#344 - NOTICE of Withdrawal of Consent to Sue ; filed by Plaintiff Patty Thomas. (Dunn, Matt)

Date	Staff	Amount of Time	Description
2/17/2016	JF	0.2	Call from claimant regarding her involvement/participation in the lawsuit 0.2
2/17/2016	ME	1	analyze data regarding opt-in discovery responses to determine overall status
2/17/2016	JF	0.1	Call to claimant regarding documents 0.1
2/17/2016	JP	0.1	JP/DG/ME review process for responding to defendant's motion to compel opt-in discovery
2/17/2016	DG	0.1	JP/DG/ME review process for responding to defendant's motion to compel opt-in discovery
2/17/2016	ME	0.5	review status of opt-in discovery
2/17/2016	ME	0.1	JP/DG/ME review process for responding to defendant's motion to compel opt-in discovery
2/17/2016	ME	0.2	MR/ME discuss process for responding to Order to compel opt-in discovery
2/18/2016	JF	0.1	Call to claimant regarding docs [questions] 0.1
2/18/2016	ME	0.6	review opt-in's documents for responsiveness to prepare for production to defense counsel
2/18/2016	ME	0.2	telephone call from opt-in to complete [questions] for discovery
2/18/2016	JF	0.2	Call to claimant regarding [questions] completion 0.2
2/18/2016	JF	0.1	Call to claimant regarding responsive documents 0.1
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	ME	0.4	JP/ME/MR(in part) review tasks needed to compare defendant's exhibits from motion to compel and reply brief
2/18/2016	JF	0.1	Call to claimant regarding documents 0.1
2/18/2016	JF	0.2	Call from claimant regarding documents 0.2
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	JF	0.3	Complete [questions] over the phone with the claimant 0.3
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	ME	2	review and highlight significant information from defendant's motion to compel opt-in discovery and reply brief
2/18/2016	JF	0.1	Call to claimant regarding documents 0.1
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	MR	0.2	JP/ME/MR(in part) review tasks needed to compare defendant's exhibits from motion to compel and reply brief
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	JP	0.4	JP/ME/MR(in part) review tasks needed to compare defendant's exhibits from motion to compel and reply brief
2/18/2016	JF	0.1	Call to claimant regarding documents 0.1
2/18/2016	DG	2	DG/JP/ME develop plan for responding to Order to respond to defendant's discovery requests
2/18/2016	JP	2	DG/JP/ME develop plan for responding to Order to respond to defendant's discovery requests
2/18/2016	MR	4.2	Kellogg reconcile amended Ex A with original Ex A
2/18/2016	JF	0.1	Call to claimant regarding documents 0.1
2/18/2016	JF	0.2	Call from claimant regarding responsive documents 0.2
2/18/2016	JF	0.3	Produce Fedex label to claimant to mail responsive documents to us 0.3
2/18/2016	ME	2	DG/JP/ME develop plan for responding to Order to respond to defendant's discovery requests
2/18/2016	JF	0.1	Call to claimant regarding documents 0.1
2/18/2016	DG	0.1	draft email to JB re retaliation concerns .1

Date	Staff	Amount of Time	Description
2/18/2016	JF	0.3	Produce Fedex label to claimant to mail responsive documents to us 0.3
2/18/2016	JP	1	dg/jp discuss next steps to reach FSV #s with clients 1
2/18/2016	JF	0.4	Call to claimants regarding documents 0.4
2/18/2016	DG	1	dg/jp discuss next steps to reach FSV #s with clients 1
2/18/2016	DG	0.9	review discovery order and def briefing re motion to compel to identify what measures needed for comprehensive compliance .9
2/18/2016	JF	0.1	Call to claimant regarding documents 0.1
2/18/2016	JF	0.1	Call to claimant regarding documents 0.1
2/18/2016	ME	0.1	telephone call from opt-in regarding concerns about severance
2/18/2016	JF	0.5	Complete Kellogg [questions] over the phone 0.5
2/18/2016	ME	1.6	compare data in defendant's exhibit A from reply brief to motion to compel opt-in discovery to our data
2/18/2016	JF	0.3	Complete [questions] with claimant over the phone 0.3
2/18/2016	JF	0.3	Call to claimant regarding [questions] completion 0.3
2/18/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
2/18/2016	ME	0.7	compile numbers of opt-ins who have no responded to discovery
2/18/2016	ME	0.1	telephone call from opt-in regading discovery
Transfer documents recd from ECF system to docket file and create file copy (Docket#346 - ORDER granting [345] Stipulated Motion to Stay Case Pending Mediation: Plaintiffs' Deadline to Respond to Kellogg's Discovery Demands 3/15/16, Identify Affirmative Experts (for certification and merits issues only) 4/4/16, Initial Affirmative Expert Reports due 4/4/16, Fact Discovery completed by 5/2/2016, Identify Rebuttal Expert Disclosure/Reports due by 5/2/2016, Expert Discovery Deadline (for certification and merits issues only) 5/30/16; signed by Judge Ronald B. Leighton.(DN)			
2/18/2016	CLER	0.1	merits issues only) 5/30/16; signed by Judge Ronald B. Leighton.(DN)
2/19/2016	ME	0.1	save opt-in's discovery documents
2/19/2016	JF	0.2	Compose email to a non-responsive claimant regarding documents 0.2
2/19/2016	JF	0.2	Conduct [questions] with claimant over the phone 0.2
2/19/2016	ME	0.7	JP/MR/ME compare list of opt-ins on Exhibit A from motion to compel opt-in discovery to the list of opt-ins on Exhibit A of defendant's reply brief
2/19/2016	ME	0.1	email opt-in regarding discovery
2/19/2016	ME	0.1	telephone call from opt-in regarding discovery
2/19/2016	ME	0.1	email opt-in regarding discovery
2/19/2016	ME	0.5	prepare opt-in's documents for production to defense counsel by reviewing for responsiveness
2/19/2016	ME	0.1	MR/ME discuss new tracking sheet that incorporates Exhibit A from defendant's motion to compel opt-in discovery and Exhibit A from defendant's reply brief
2/19/2016	MR	0.7	JP/MR/ME compare list of opt-ins on Exhibit A from motion to compel opt-in discovery to the list of opt-ins on Exhibit A of defendant's reply brief
2/19/2016	JP	0.7	JP/MR/ME compare list of opt-ins on Exhibit A from motion to compel opt-in discovery to the list of opt-ins on Exhibit A of defendant's reply brief
2/19/2016	JF	0.2	Produce Fedex label for claimant to mail responsive documents to us 0.2
2/19/2016	ME	0.4	prepare opt-in's documents for production to defense counsel by reviewing for responsiveness
2/19/2016	ME	0.2	prepare opt-in documents for production to defense counsel by reviewing and bates stamping
2/19/2016	MR	0.1	MR/ME discuss new tracking sheet that incorporates Exhibit A from defendant's motion to compel opt-in discovery and Exhibit A from defendant's reply brief

Date	Staff	Amount of Time	Description
2/19/2016	JF	0.1	Call to claimant regarding the documents 0.1
2/19/2016	ME	1	review status of sample of opt-ins listed on defendant's Exhibit A to Reply in support of defendant's motion to compel discovery responses
2/19/2016	JF	0.1	Call to claimant regarding documents 0.1
2/19/2016	ME	2.5	update tracking spreadsheet for opt-in discovery to include new responses 1.8; review status of discovery .7
2/19/2016	ME	0.4	prepare opt-in's discovery documents for production to defense counsel by reviewing, bates stamping, and redacting privileged information
2/19/2016	ME	0.1	save opt-in's discovery documents
2/19/2016	JF	0.1	Compose email to a non-responsive claimant regarding documents 0.1
2/19/2016	ME	0.1	prepare opt-in's documents for defense counsel by reviewing and bates stamping
2/22/2016	JP	0.2	JP/MR discuss updated mediation risk discounts and class damages
2/22/2016	MR	0.3	MR/ME review information needed to continue tracking opt-ins who have not responded to discovery
2/22/2016	CLER	0.3	create PDF format of documents recd from client (discovery documents)
2/22/2016	MR	0.2	JP/MR discuss updated mediation risk discounts and class damages
2/22/2016	DG	0.2	dg/mr/jp discuss process of discussing settlement with named plaintiffs and their expectations .2
2/22/2016	ME	2.7	DG/MD/MR/JP/ME discuss mediation risk and plan for mediation
2/22/2016	JF	0.2	Call from claimant regarding documents 0.2
2/22/2016	ME	1.1	analyze opt-in discovery tracking spreadsheet to determine number of nonresponders to share with litigation team
2/22/2016	ME	0.2	return telephone call to opt-in regarding case update .1; notes from conversation .1
2/22/2016	ME	0.1	telephone call to opt-in regarding opt-in's severance concerns
2/22/2016	MR	1.3	work on amended Ex.A to pull in current employee, TM status (excluded status) and severance
2/22/2016	JF	3.2	Prepare letters to non-responsive claimants to mail responsive documents to us 3.2
2/22/2016	ME	0.1	telephone call with opt-in regarding discovery documents
2/22/2016	DG	2.7	DG/MD/MR/JP/ME discuss mediation risk and plan for mediation 2.7
2/22/2016	JP	0.2	dg/mr/jp discuss process of discussing settlement with named plaintiffs and their expectations .2
2/22/2016	MR	2.7	DG/MD/MR/JP/ME discuss mediation risk and plan for mediation
2/22/2016	MR	0.2	dg/mr/jp discuss process of discussing settlement with named plaintiffs and their expectations .2
2/22/2016	ME	0.3	prepare opt-in's documents for production to defense counsel by reviewing .2; and bates stamping .1
2/22/2016	JP	2.7	DG/MD/MR/JP/ME discuss mediation risk and plan for mediation
2/22/2016	MD	2.6	DG/MD/MR/JP/ME discuss mediation risk and plan for mediation
2/22/2016	ME	0.3	research opt-in associated with incorrect email address
2/22/2016	ME	0.1	JF/ME review contact with opt-in regarding discovery
2/22/2016	JF	0.1	JF/ME review contact with opt-in regarding discovery
2/22/2016	ME	0.3	MR/ME review information needed to continue tracking opt-ins who have not responded to discovery
2/23/2016	ME	0.3	review documents received from opt-in
2/23/2016	ME	0.5	anaylze list of non-responders according to defendant's Exhibit A of reply brief
2/23/2016	JP	0.3	JP/MR discuss future strategies in case or with individuals in case

Date	Staff	Amount of Time	Description
2/23/2016	MR	0.6	add Time Matters contact info and other data into temp amended Ex. A sheet .5; transfer info to active amended Ex. A sheet .1
2/23/2016	ME	0.3	compile list of opt-ins who have not responded to discovery
2/23/2016	MR	0.7	JP/MR discuss motion to compel work issues and progress
2/23/2016	JF	0.2	JF/ME review task of verifying receipt of separation agreement in defense counsel's production
2/23/2016	MR	0.1	read and consider email from ME about non-responders in context of damage calcs
2/23/2016	ME	0.4	review personnel files for a sample of opt-ins regarding severance agreements
2/23/2016	MR	0.1	ME/MR phone call about severance agreements
2/23/2016	ME	0.1	email information about opt-in discovery responses to litigation team
2/23/2016	ME	0.6	review list of opt-ins who are on defendant's Exhibit A in reply brief to motion to compel but are not on Exhibit A of motion to compel to determine which category opt-in falls within
2/23/2016	DG	0.6	legal research on 9th Cir. service awards .5; email to litigation team re same .1
2/23/2016	ME	0.1	ME/MR phone call about severance agreements
2/23/2016	MR	0.3	examine separation agreements and general releases .2, reply to email from ME about separation agreements .1
2/23/2016	ME	0.7	create detailed list of all paralegal tasks needed to complete for opt-in discovery and mediation
2/23/2016	JP	0.7	JP/MR discuss motion to compel work issues and progress
2/23/2016	ME	0.6	track opt-ins who need to be followed up with regarding their response to new [questions] for discovery
2/23/2016	ME	0.1	review status of responses to new [questions] for discovery
2/23/2016	MR	0.4	pull new group markers from amended Ex A sheet into tracking sheet
2/23/2016	ME	0.3	MR/ME discuss tech process for reviewing opt-in's emails for responsiveness .2; discuss tasks needed to prepare for mediation .1
2/23/2016	ME	0.5	review list of opt-ins to determine who needs to be sent a letter regarding discovery
2/23/2016	MR	0.1	ME/MR phone call to discuss use of tentative tabulation of non-responders for damage calcs assessment
2/23/2016	MR	0.3	MR/ME discuss tech process for reviewing opt-in's emails for responsiveness .2; discuss tasks needed to prepare for mediation .1
2/23/2016	ME	0.1	ME/MR phone call to discuss use of tentative tabulation of non-responders for damage calcs assessment
2/23/2016	ME	0.2	JF/ME review task of verifying receipt of separation agreement in defense counsel's production
2/23/2016	ME	1	prepare opt-in's documents for production to defense counsel by: reviewing opt-in's documents for responsiveness .7; breaking documents into separate files based on their responsiveness .3
2/23/2016	JF	4.6	Verify receipt of separation agreements in defense counsel's production 4.6
2/23/2016	ME	0.4	analyze list of opt-ins included on defendant's exhibit A to reply brief but not on Exhibit A of motion to compel discovery
2/23/2016	MR	0.6	pull temporary non-responder markers into temp version of amended Ex A .4, examine data relating to non-responders .2
2/24/2016	ME	0.1	JP/ME discuss creating a spreadsheet to track opt-ins concerned about retaliation
2/24/2016	ME	0.5	review opt-in [questions] responses for rog to verify no further information is needed
2/24/2016	ME	0.4	review status of opt-in discovery responses

Date	Staff	Amount of Time	Description
2/24/2016	JP	0.1	JP/ME discuss creating a spreadsheet to track opt-ins concerned about retaliation
2/24/2016	CLER	0.2	prepare mailing client (return of org. documents)
2/24/2016	ME	0.4	create new discovery [questions] for opt-ins on defendant's Exhibit A to reply brief re def's MTC discovery
2/24/2016	JF	1.7	Verify receipt of separation agreements in defense counsel's production 1.7
2/24/2016	DG	1.5	prepare for meeting with Pls by reviewing materials .3; dg/md call with Pls to discuss fair settlement value of case 1.1; debrief meeting .1
2/24/2016	ME	0.3	designate on tracking sheet those opt-ins who need to be part of mail merge to receive email regarding discovery
2/24/2016	ME	1.2	review status of opt-ins who are on Exhibit A of defendant's reply brief re MTC discovery
2/24/2016	ME	0.1	read email from defense counsel re company reorganization
2/24/2016	MD	0.3	review and edit outline for call with clients re mediation 0.3
2/24/2016	MR	0.1	read through email thread about plaintiffs worry about Kellogg reorganization
2/24/2016	JP	0.5	JP/ME discuss status of mediation
2/24/2016	ME	0.1	save and track documents sent by opt-ins
2/24/2016	ME	0.7	JP/MR/ME review estimated damage calculations for opt-ins who have not responded to discovery
2/24/2016	ME	0.3	edit discovery [questions] for new group of opt-ins
2/24/2016	ME	0.3	create spreadsheet to track opt-ins with retaliation concerns
2/24/2016	ME	0.1	JP/ME discuss talking to opt-ins with concerns about company reorganization
2/24/2016	CLER	0.5	create PDF format of documents recd from client (discovery documents)
2/24/2016	MR	0.1	read through email thread about estimating possible settlement allocations for discovery reps and other opt-ins
2/24/2016	ME	0.2	telephone call from opt-in regarding company restructuring
2/24/2016	ME	0.3	draft email to new category of opt-ins who need to respond to discovery
2/24/2016	MR	1.3	set up excel merge sheet for group 6 current employees .6, calculate estimated allocation figures to use for mail merge .7
2/24/2016	JP	0.7	JP/MR/ME review estimated damage calculations for opt-ins who have not responded to discovery
2/24/2016	ME	0.5	JP/ME discuss status of mediation
2/24/2016	MR	0.7	JP/MR/ME review estimated damage calculations for opt-ins who have not responded to discovery
2/24/2016	MD	1.2	dg/md call with Pls to discuss fair settlement value of case 1.1; debrief meeting .1
2/24/2016	ME	0.2	review opt-in's severance information
2/24/2016	JP	0.1	JP/ME discuss talking to opt-ins with concerns about company reorganization
2/24/2016	ME	0.1	listen to voicemail from opt-in
2/24/2016	AG	2.9	review documents recd from client (discovery documents)
2/24/2016	CLER	0.4	create PDF format of documents recd from client (discovery documents)
2/24/2016	ME	0.2	prepare opt-in's documents for production by reviewing and bates stamping
2/24/2016	MR	0.1	email location of most current calculations to atty DG for calls to class reps
2/25/2016	CLER	0.2	create PDF format of documents recd from client (discovery documents)
2/25/2016	ME	0.3	telephone call from opt-in regarding company reorganization .2; notes from conversation .1
2/25/2016	ME	0.2	telephone call with opt-in regarding email about discovery
2/25/2016	ME	0.1	telephone call from opt-in regarding discovery documents
2/25/2016	ME	0.1	email opt-in regarding discovery documents
2/25/2016	JP	0.2	md/jp call to client about mediation 0.2



Date	Staff	Amount of Time	Description
2/25/2016	ME	0.1	MR/ME discuss language of email to opt-ins for discovery
2/25/2016	MD	0.1	md/jp call to client about mediation 0.1
2/25/2016	MD	0.1	dg/md call to discuss status of client calls re settlement at end of day .1
2/25/2016	MR	0.1	MR/ME discuss language of email to opt-ins for discovery
2/25/2016	ME	0.3	MR/ME send mail merged emails to opt-ins regarding discovery
2/25/2016	MD	0.2	md/jp call to client about mediation 0.2
2/25/2016	MR	0.3	MR/ME send mail merged emails to opt-ins regarding discovery
2/25/2016	JP	0.5	JP/MR review issues of class state damages
2/25/2016	MD	0.5	md/jp call to client about mediation 0.5
2/25/2016	JP	0.5	md/jp call to client about mediation 0.5
2/25/2016	ME	0.1	telephone call from opt-in regarding case update
2/25/2016	MR	1	create estimated allocations chart for opt-ins .9, email to paras JP and ME .1
2/25/2016	AG	0.5	review documents recd from client (discovery documents)
2/25/2016	CLER	0.2	prepare mailing client (return of org. documents)
2/25/2016	ME	2	review opt-ins's [questions] responses to verify discovery is complete
2/25/2016	JP	0.2	dg/jp discuss whats needed next re client authorization for settlement .2
2/25/2016	DG	0.2	dg/jp discuss whats needed next .2
2/25/2016	DG	0.3	dg/jp discuss status and response of named plaintiffs to our Fair Settlement Value calcs .3
2/25/2016	MD	0.2	md/dg discuss mediation and md calls with clients 0.2
2/25/2016	ME	0.2	MD/ME review status of opt-ins on defendant's Exhibit A to reply brief to defendnat's motion to compel discovery
2/25/2016	MR	0.2	email to team about law firm handling Hershey cases in No. Cal district
2/25/2016	DG	0.2	md/dg discuss mediation and md calls with clients 0.2
2/25/2016	ME	0.1	reply to opt-in's email regarding discovery
2/25/2016	MR	0.5	configure mail merge word document .3, reconfigure mail merge document after para MA edited the document .2
2/25/2016	MR	0.5	JP/MR review issues of class state damages
2/25/2016	JP	0.3	dg/jp discuss status and response of named plaintiffs to our Fair Settlement Value calcs .3
2/25/2016	DG	0.1	dg/md call to discuss status of client calls re settlement at end of day .1
2/25/2016	JP	0.1	md/jp call to client about mediation 0.1
2/25/2016	ME	0.2	email opt-in regarding opt-in's voicemail
2/25/2016	MD	0.1	email defense counsel about 30b6 deposition 0.1
2/25/2016	ME	0.3	read public information regarding similar lawsuit
2/25/2016	ME	1	begin to prepare spreadsheet of opt-in discovery status to send to defense counsel
2/25/2016	JF	0.3	Call from claimant regarding [questions] completion 0.3
2/25/2016	ME	0.2	prepare opt-in's documents for production by reviewing and bates stamping
2/25/2016	MD	0.2	MD/ME review status of opt-ins on defendant's Exhibit A to reply brief to defendnat's motion to compel discovery
2/25/2016	JP	0.5	md/jp call to named plaintiff about third mediation 0.5
2/25/2016	ME	0.2	edit draft email to group of opt-ins for discovery
2/25/2016	ME	0.1	save opt-in's discovery document
2/25/2016	CLER	2.5	create PDF format of documents recd from client (discovery documents)
2/25/2016	JP	0.3	JP/MR confer on possible settlement figures to provide plaintiffs
2/25/2016	MD	0.5	md/jp discusssing edits to email to named plaintiffs re potential settlement, and strategy to discuss claims with clients 0.5
2/25/2016	ME	0.1	reply to opt-in's email regarding discovery
2/25/2016	MD	0.5	md/jp call to named plaintiff about third mediation 0.5

Date	Staff	Amount of Time	Description
2/25/2016	MR	0.3	JP/MR confer on possible settlement figures to provide plaintiffs
2/25/2016	JP	0.5	md/jp discussing edits to email to named plaintiffs re potential settlement, and strategy to discuss claims with clients 0.5
2/26/2016	JP	0.2	JP/JF Review update spreadsheet to verify receipt of separation agreements in defense council's production 0.2
2/26/2016	JF	0.2	JP/JF Review update spreadsheet to verify receipt of separation agreements in defense council's production 0.2
2/26/2016	DG	2.4	drive to mediation 2.4
2/26/2016	MR	2.4	drive to mediation 2.4
2/26/2016	CLER	0.2	create PDF format of documents recd from client
2/26/2016	JP	2	team meeting discussing mediation strategy/issues 2.0
2/26/2016	MR	2	team meeting discussing mediation strategy/issues 2.0
2/26/2016	CLER	2.5	create PDF format of documents recd from client (discovery documents) team meeting discussing mediation strategy/issues 2.0; create term sheet for use at mediation .7
2/26/2016	DG	2.7	Update spreadsheet to verify receipt of separation agreements in defense counsel's production 0.6
2/26/2016	JF	0.6	production 0.6
2/26/2016	MD	1	1.0 calling clients about mediation
2/26/2016	MD	2	team meeting discussing mediation strategy/issues 2.0
2/26/2016	JP	2	team meeting discussing mediation strategy/issues 2.0
2/26/2016	MR	2	team meeting discussing mediation strategy/issues 2.0
2/27/2016	MR	8	dg/mr travel to mediation 1.5; mediation 10 -12:30 (2.5); debrief Kellogg position and failure of mediation 1; return travel 3
2/27/2016	MD	6.5	drive to/from mediation in Philadelphia 6.5
2/27/2016	MD	3	attend mediation in Philadelphia 3.0
2/27/2016	DG	8	dg/mr travel to mediation 1.5; mediation 10 -12:30 (2.5); debrief Kellogg position and failure of mediation 1; return travel 3
2/27/2016	MR	0.9	web research for DSD/Grocery expert witness .5, send three emails to team about possible expert witnesses .2
2/29/2016	MD	0.3	prepare for meeting re complete litigation 0.3
2/29/2016	JK	0.6	JK/MR recap of saturday's mediation
2/29/2016	ME	1.3	review opt-in's [questions] responses to sort who has completed discovery
2/29/2016	CLER	0.1	create PDF format of correspondence from JAMS ( confirmation of mediation 2/27/2016)
2/29/2016	CLER	1	create PDF format of documents recd from client (discovery documents)
2/29/2016	ME	0.2	email opt-in regarding completing new [questions] for discovery
2/29/2016	MR	0.4	JK/MR recap of saturday's mediation
2/29/2016	JK	0.6	JK/MR recap of saturday's mediation
2/29/2016	ME	0.1	JF/ME review contact made to clients regarding discovery
2/29/2016	ME	0.2	telephone call from opt-in regarding case update .1; notes from conversation .1
2/29/2016	MD	0.1	md/dg discussing response to kellogg about filing motion under seal re willard bishop 0.1
2/29/2016	JF	0.1	JF/ME review contact made to clients regarding discovery
2/29/2016	DG	0.2	md/dg discussing response to kellogg about filing motion under seal re willard bishop 0.1; review rules on filing under seal re def proposal .1
2/29/2016	JP	2.1	MD/MR/DG/JP/ME dicuss outcome of mediation .5; review plan for continuing litigation 1.0; determine plan for responding to discovery Order granting defedant's motion to compel .8

Date	Staff	Amount of Time	Description
2/29/2016	DG	2.1	MD/MR/DG/JP/ME dicuss outcome of mediation .5; review plan for continuing litigation 1.0; determine plan for responding to discovery Order granting defedant's motion to compel .8
2/29/2016	MR	2.1	MD/MR/DG/JP/ME dicuss outcome of mediation .5; review plan for continuing litigation 1.0; determine plan for responding to discovery Order granting defedant's motion to compel .8
2/29/2016	ME	1.2	JP/ME review tasks needed to complete to respond to Order granting defendant's motion to compel opt-in discovery
2/29/2016	MD	2.1	MD/MR/DG/JP/ME dicuss outcome of mediation .5; review plan for continuing litigation 1.0; determine plan for responding to discovery Order granting defedant's motion to compel .8
2/29/2016	CLER	0.2	create PDF format of documents recd from client (discovery documents)
2/29/2016	ME	0.1	email opt-in regarding completing new [questions] for discovery
2/29/2016	ME	0.6	[compile] new [questions] responses for opt-in discovery .1; save new responses .1; track new responses .4
2/29/2016	ME	0.2	email KW task related to discovery Order granting defendant's motion to compel
2/29/2016	JP	1.2	JP/ME review tasks needed to complete to respond to Order granting defendant's motion to compel opt-in discovery
2/29/2016	CLER	0.6	create PDF format of documents recd from client (discovery documents)
2/29/2016	CLER	0.2	track receipt of opt-in documents .1; file documents .1
2/29/2016	ME	0.1	telephone call from opt-in regarding case update
2/29/2016	ME	2.1	MD/MR/DG/JP/ME dicuss outcome of mediation .5; review plan for continuing litigation 1.0; determine plan for responding to discovery Order granting defedant's motion to compel .8
2/29/2016	MD	0.1	call with defense counsel about willard bishop study and defendants' motion for reconsideration 0.1
2/29/2016	MD	0.1	md call with defense counsel re ex parte letter kellogg intends to file re willard bishop study 0.1
2/29/2016	ME	0.4	telephone call with opt-in regarding company reorganization .3; notes from conversation .1
3/1/2016	KW	0.2	AN/KW/JF Review tracking spreadsheets for non-responsive Kellogg claimants 0.2
3/1/2016	JP	2	JLP/ME/KW litigation team meeting to review spreadsheet data and plan most effective and efficient method to gather data and respond to defendant's discovery demands
3/1/2016	KW	0.2	telephone call to gather informatin needed to rspnd to defendant's discovery demands .1
3/1/2016	ME	0.1	email opt-in new [questions] for discovery
3/1/2016	MR	0.3	dg/mr discuss para needs for next steps in getting unresponsive clients documented and reached to prepare interrogs and doc requests
3/1/2016	ME	2	JLP/ME/KW litigation team meeting to review spreadsheet data and plan most effective and efficient method to gather data and respond to defendant's discovery demands
3/1/2016	JP	1.2	JP/ME develop process for determining status of opt-in discovery to send to defense counsel for joint response to Order
3/1/2016	ME	0.1	listen to voicemails from opt-ins
3/1/2016	AN	0.2	AN/KW/JF Review tracking spreadsheets for non-responsive Kellogg claimants 0.2

Date	Staff	Amount of Time	Description
3/1/2016	KW	0.2	review plaintiff's emailed responses to defendant's discovery demands .1 forward to lead paralegal .1
3/1/2016	MR	2.5	create new current employees excel workbook including sources from [questionnaire] and kellogg payroll history data
3/1/2016	ME	0.1	email opt-in new [questions] for discovery
3/1/2016	DG	0.2	md/dg/mr discussing process for confirming discovery production for plaintiffs (dg 0.2) (mr/md (0.4))
3/1/2016	DG	0.3	review client retaliation [questions] .3
3/1/2016	ME	0.3	review document status of opt-ins who need to be contacted to clarify [questions] responses for discovery
3/1/2016	ME	0.1	email opt-in regarding new [questions] for discovery
3/1/2016	KW	0.1	update case notes .1
3/1/2016	AN	0.1	Telephone call from opt-in in response to call about [questions] questions
3/1/2016	ME	0.3	MR/ME discuss process for providing opt-in discovery status to defense counsel for joint response to Order
3/1/2016	JF	0.2	AN/KW/JF Review tracking spreadsheets for non-responsive Kellogg claimants 0.2
3/1/2016	AN	0.1	Telephone call from opt-in
3/1/2016	MR	0.3	MR/ME discuss process for providing opt-in discovery status to defense counsel for joint response to Order
3/1/2016	ME	1.2	JP/ME develop process for determining status of opt-in discovery to send to defense counsel for joint response to Order
3/1/2016	KW	0.1	draft email to litigation team, relaying plaintiff's fears about possible retaliation if he produces resume as required y defendant's discovery demands-
3/1/2016	AG	0.2	[questions] (Current Snack Employees & Reorganization draft )
3/1/2016	KW	2	JLP/ME/KW litigation team meeting to review spreadsheet data and plan most effective and efficient method together data and respond to defendant's discovery demands
3/1/2016	CLER	2.1	create PDF format of documents recd from client (discovery documents)
3/1/2016	DG	0.3	dg/mr discuss para needs for next steps in getting unresponsive clients documented and reached to prepare interrogos and doc requests
3/1/2016	ME	0.1	email opt-in new [questions] for discovery
3/1/2016	KW	0.5	review [questions] form to determine information needed to complete discovery responses .1 telephone call to plaintiff to gather information needed .2 update cae notes .1 email information to lead paralegal .1
3/1/2016	ME	0.2	send email to opt-in regarding completing new [questions] for discovery
3/1/2016	MR	0.1	review website post about mediation
3/1/2016	KW	0.3	telephone call to plaintiff to clarify [questions] responses to respond to defendant's discovery demands .1 update case notes .1 add informatio to Tracking spreadsheet .1 added amended Ex A marker and estimated damages per plaintiff to Tracking Answer to
3/1/2016	MR	0.7	Rogs sheet
3/1/2016	KW	0.3	telephone call to clarify document production questions .1 update case notes .1 add information to tracking spreadsheet .1
3/1/2016	KW	0.3	draft and send email to plaintiff to calrify [questions] responses to respond to defendant's discovery demands .1 update case notes .1 add informatio to Tracking spreadsheet .1
3/1/2016	KW	0.2	telephone call regaridng resumes he may have- discussion of fear of retaliation if he produces a resume

Date	Staff	Amount of Time	Description
3/1/2016	ME	2	update opt-in discovery tracking spreadsheet to indicate who has confirmed they have or do not have responsive documents
3/1/2016	ME	0.1	email opt-in new [questions] for discovery
3/1/2016	AN	0.2	Locate links to documents regarding attempted contact with opt-in
3/1/2016	ME	0.4	ME/KW review spreadsheet of unclear discovery responses to determine information needed to fully respond to defendant's discovery demands .1 review [questionnaire] responses to identify unclear and/or contradictory responses which need clarification .2 outline work needed to proceed to gather information needed .1
3/1/2016	KW	0.2	telephone call to gather information needed to complete discovery responses .1 update case notes .1
3/1/2016	KW	0.4	telephone call to plaintiff to clarify [questions] responses needed to respond to defendant's discovery demands .2 update case notes .1 add information to tracking spreadsheet .1
3/1/2016	KW	0.4	telephone call to clarify document production needed to respond to defendant's discovery demands .1 add information to tracking spreadsheet .1 update case notes .1 email confirmation to plaintiff .1
3/1/2016	ME	0.1	ME/KW confer regarding [questions] responses to be validated and document search .1
3/1/2016	ME	0.3	provide feedback regarding [questions] to opt-ins concerning retaliation
3/1/2016	ME	0.1	email opt-in new [questions] for discovery
3/1/2016	MD	0.4	md/dg/mr discussing process for confirming discovery production for plaintiffs (dg 0.2) (mr/md (0.4))
3/1/2016	KW	0.1	ME/KW confer regarding [questions] responses to be validated and document search .1
3/1/2016	ME	0.1	email opt-in new [questions] for discovery
3/1/2016	KW	0.4	ME/KW review spreadsheet of unclear discovery responses to determine information needed to fully respond to defendant's discovery demands .1 review [questionnaire] responses to identify unclear and/or contradictory responses which need clarification .2 outline work needed to proceed to gather information needed .1
3/1/2016	CLER	0.2	prepare mailing client (return of org. documents)
3/1/2016	KW	0.2	telephone call to clarify [questions] responses to complete responses to defendant's discovery demands .1 update case notes .1
3/1/2016	AN	0.1	Telephone call from opt-in regarding email he received
3/1/2016	KW	0.3	telephone call to plaintiff to clarify [questions] responses-needed to respond to defendant's discovery demands .1 update Tracking spreadsheet .1 add information to case notes .1
3/1/2016	MR	0.4	md/dg/mr discussing process for confirming discovery production for plaintiffs (dg 0.2) (mr/md (0.4))
3/2/2016	MD	0.5	MD/JP/ME develop plan to contact opt-ins who have still not completed discovery
3/2/2016	JP	0.5	MD/JP/ME develop plan to contact opt-ins who have still not completed discovery
3/2/2016	MD	0.6	drafting retaliation discovery demand 0.6
3/2/2016	MD	0.5	MD/ME review status of opt-in discovery to determine priority opt-ins to contact re completing discovery
3/2/2016	ME	0.5	MD/JP/ME develop plan to contact opt-ins who have still not completed discovery

Date	Staff	Amount of Time	Description
3/2/2016	ME	0.5	compile information to provide to other team members to complete tasks regarding contacting opt-ins who have not completed discovery
3/2/2016	ME	0.6	update tracking spreadsheet to include newly received opt-in responses regarding documents
3/2/2016	ME	0.1	prepare opt-in's document for production to defense counsel by reviewing and bates stamping
3/2/2016	ME	0.8	md/me discussing next steps in assessing plaintiffs discovery responses 0.8
3/2/2016	MR	0.4	scan pages of DSD book contributors for experts on Direct Store Delivery .3, email scanned pages to MD .1
3/2/2016	ME	0.1	prepare opt-in's documents for production to defense counsel by reviewing and bates stamping
3/2/2016	JS	0.3	js/md discuss depo scheduling and logistics
3/2/2016	MD	0.3	js/md discuss depo scheduling and logistics
3/2/2016	ME	0.1	telephone call with opt-in regarding discovery
3/2/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#348 - PROPOSED ORDER (Unsigned) re [347] MOTION for Reconsideration of Order Compelling Production of Willard Bishop Study (Nelson, James)
3/2/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#347 - MOTION for Reconsideration of Order Compelling Production of Willard Bishop Study by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1) Exhibit A) Noting Date 3/18/2016, (Nelson, James)
3/2/2016	MR	0.2	order 2nd copy of Direct Store Delivery book from Amazon
3/2/2016	ME	0.1	prepare opt-in's documents for discovery by reviewing and bates stamping
3/2/2016	ME	0.2	prepare opt-in's documents for discovery by reviewing and bates stamping .1; and redacting privilege information .1
3/2/2016	DG	0.3	md/dg discussing next steps in case including arguments to make re plaintiffs who are non-responsive to discovery 0.3
3/2/2016	MD	0.8	md/me discussing next steps in assessing plaintiffs discovery responses 0.8
3/2/2016	CLER	1.45	create PDF format of documents recd from client (discovery documents)
3/2/2016	MR	0.1	locate and email to MD the webpage of attorney's article on DSD for possible help in locating expert witness
3/2/2016	MD	0.5	call with potential expert 0.5
3/2/2016	MD	0.3	md/dg discussing next steps in case including arguments to make re plaintiffs who are non-responsive to discovery 0.3
3/2/2016	ME	0.1	telephone call from opt-in regarding case update
3/2/2016	MR	0.5	MD/MR call with potential expert 0.5
3/2/2016	AG	1	prepare Letters/Mailing to clients (ltr to Group 1 no rogs, no docs)
3/2/2016	MD	0.1	md/ar discussing mediation date 0.1
3/2/2016	JP	1.6	JP/ME update tracking spreadsheet to indicate opt-ins who have completed discovery
3/2/2016	ME	0.5	MD/ME review status of opt-in discovery to determine priority opt-ins to contact re completing discovery
3/2/2016	MD	1.3	speaking with clients about discovery responses 1.3
3/2/2016	ME	0.4	review emails from opt-ins regarding discovery .3; save emails sent by opt-ins .1
3/2/2016	ME	1.6	JP/ME update tracking spreadsheet to indicate opt-ins who have completed discovery
3/2/2016	ME	0.1	prepare opt-in's documents for production to defense counsel by reviewing and bates stamping



Date	Staff	Amount of Time	Description
			prepare opt-in's documents for production to defense counsel by reviewing and bates
3/2/2016	ME	0.2	stamping .1; and redacting privilege information .1
3/3/2016	MD	0.3	MD/JP/ME status update of tasks to complete opt-in discovery
3/3/2016	JP	0.3	MD/JP/ME status update of tasks to complete opt-in discovery
			telephone call to establish contact with plaintiff regarding defendant's discovery requests
			.1 email to plaintiff regarding process to produce resume .1 add information to case
3/3/2016	KW	0.3	notes .1
3/3/2016	ME	0.1	listen to voicemail from opt-in
3/3/2016	ME	0.3	MD/JP/ME status update of tasks to complete opt-in discovery
			analyze opt-in discovery tracking spreadsheet to update opt-ins who have completed
3/3/2016	ME	0.4	[questions]
			analyze opt-in discovery tracking spreadsheet to determine what is still needed from
3/3/2016	ME	1.1	those who are not yet complete
3/3/2016	ME	0.1	reply to opt-in's email to confirm receipt of [questions] for discovery
			telephone call to establish contact with plaintiff .1 draft email to explain claims and
			discovery demands of defendant .1 update case notes .1 add information to Tracking
3/3/2016	KW	0.4	spreadsheet .1
			telephone call to establish contact with plaintiff .1 email to plaintiff regarding document
			production to satisfy demands of defendant regarding discovery .1 add information to
3/3/2016	KW	0.3	case notes .1
3/3/2016	MD	1	call with clients about discovery production 1.0
3/3/2016	MD	0.1	md/kw discuss status of follow up phone calls 0.1
3/3/2016	ME	0.1	telephone call from opt-in regarding [questions] for discovery
			draft and send email regarding need to respond to defendant's discovery demands or
3/3/2016	KW	0.3	lose claim .1 update case notes .1 add information to Tracking spreadsheet .1
			telephone call from opt-in regarding discovery and company reorg .1; notes from
3/3/2016	ME	0.2	conversation .1
3/3/2016	AG	0.1	AG/KW confer regarding attempts to establish contact with plaintiff .1
			draft email regarding need to satisfy defendant's discovery demands .1 add information
3/3/2016	KW	0.3	to case notes .1 update Tracking spreadsheet .1
3/3/2016	MS	0.1	expert research
3/3/2016	MD	0.1	md/js discussing deposition dates 0.1
3/3/2016	KW	0.2	received resume to complete discovery needed .1 update case notes .1
3/3/2016	KW	0.1	AG/KW confer regarding attempts to establish contact with plaintiff .1
			research case contacts for each of 38 plaintiff to determine contact efforts made .3 draft
3/3/2016	KW	0.4	email to lead paralegal regarding results of research .1
			draft email to AG to request he pursue research for current contact information for
3/3/2016	KW	0.1	plaintiff
			Transfer documents recd from ECF system to docket file and create file copy (Docket#349
			- NOTICE that the following is RE-NOTED: [347] MOTION for Reconsideration of Order
			Compelling Production of Willard Bishop Study. Filed by Defendants Kellogg Company,
3/3/2016	CLER	0.1	Kellogg Sales Company. Noting Date 3/1/2016, (Nelson, James)
3/3/2016	ME	0.1	telephone call from opt-in regarding [questions] for discovery
3/3/2016	JP	0.1	JLP/KW confer regarding additional efforts to contact plaintiff .1
			for each non-responsive plaintiff research case notes and spreadsheets of contacts to
3/3/2016	KW	0.4	determine which plaintiffs have been contacted by email, letter, text or phone call .4

Date	Staff	Amount of Time	Description
			telephone call to establish contact with plaintiff .1 email to gather information needed to respond to discovery demands .2 add information to case notes .1 update tracking
3/3/2016	KW	0.4	spreadsheet .1
3/3/2016	MR	0.2	md/mr discussing data extraction needed for named plaintiffs' emails 0.2
3/3/2016	ME	0.1	reply to opt-in's email to confirm receipt of [questions] for discovery
			prepare ltr to client (Prepare letter to client (asked to provide us with Court required information for overtime claim by completing a [questions] and sending documents. Have not received [questions] despite multiple attempts to contact in the past year. Indicating the Court ordered you to provide answers to Kellogg's questions and to provide the requested documents you have by March 15, 2016 or you may be dismissed from the
3/3/2016	AG	0.2	case.)
3/3/2016	MD	0.2	md/mr discussing data extraction needed for named plaintiffs' emails 0.2
3/3/2016	ME	0.9	track new [questions] responses for opt-in discovery
3/3/2016	ME	0.3	download and save new [questions] responses for opt-in discovery
3/3/2016	KW	0.1	JLP/KW confer regarding additional efforts to contact plaintiff .1
3/3/2016	AG	0.2	conduct search (on updated contact information)
3/3/2016	MD	3.5	md research potential experts and email them 3.5
			telephone call to establish contact with plaintiff .1 email to gather information needed
3/3/2016	KW	0.3	to respond to defendant's discovery demands .1 add information to case notes .1
			JLP/KW review llist of plaintitffs for whom we need a [questions] to complete
3/3/2016	KW	0.2	interrogatories .2
			ME/KW review list of plaintitffs needing contacts .1 determine what is needed from each
3/3/2016	KW	0.2	one to satisfy defendant's discovery demands .1
			telephone interview to gather information to complete [questions] necessary to respond to defendant's discovery demands .4 organize, edit and enter information as needed in appropriate response forms .2 email to plaintiff regarding details and process to produce
3/3/2016	KW	0.9	required documents .1 add information to case notes .1 update Tracking spreadsheet .1
			input data into spreadsheet that will be sent to defense counsel regarding opt-in
3/3/2016	ME	1.8	discovery
3/3/2016	JP	0.7	MD/JP/ME review status of tasks and plan for completing opt-in discovery
			telephone call to plaintiff to clarify [questions] responses .1 email to plaintiff regarding document production .1 add information to case notes .1 update tracking spreadsheet
3/3/2016	KW	0.4	.1
			telephone call to establish contact with plaintiff .1 email to plaintiff regarding information needed to respond to defendant's discovery demands .1 update case notes
3/3/2016	KW	0.4	.1 update tracking spreadsheet .1
			telephone call to plaintiff regarding information needed to respond to defendant's discovery demands .1 draft email to plaintiff explaining need to comply with discovery
3/3/2016	KW	0.4	demands .2 update case notes .1
			telephone call to gather information needed for discovery demands .1 email to plaintiff
3/3/2016	KW	0.3	outlining material needed to respond to court order .1 add information to case notes .1
3/3/2016	ME	0.7	MD/JP/ME review status of tasks and plan for completing opt-in discovery
			draft email to plaintiff outlining need to respond to defendant's discovery demands .1
3/3/2016	KW	0.3	update case notes .1 add information to Tracking spreadsheet.1
3/3/2016	CLER	3.1	create PDF format of documents recd from client (discovery documents)
3/3/2016	AG	0.5	conduct person search (unreachable client)
3/3/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)

Date	Staff	Amount of Time	Description
3/3/2016	ME	1	verify data regarding documents and rogs produced for opt-ins
3/3/2016	MR	1.3	create new set of rog answers for 24 plaintiffs 1.2, email results to paras .1
3/3/2016	MD	0.7	MD/JP/ME review status of tasks and plan for completing opt-in discovery
3/4/2016	ME	0.1	email opt-in [questions] for discovery
3/4/2016	CLER	0.2	create PDF format of documents recd from client (discovery documents)
3/4/2016	DG	0.5	dg/md/ and for part of time MR, JP, ME - call to possible expert to inquire as to his credentials and ability to answer question re primary job duty .5
3/4/2016	JS	0.2	call with plt to confirm depo and prep date
3/4/2016	ME	2.3	update tracking spreadsheet to determine number of opt-ins who have completed discovery 1.0; analyze spreadsheet to determine who may not have been contacted 1.3
3/4/2016	ME	0.5	dg/md/ and for part of time MR, JP, ME - call to possible expert to inquire as to his credentials and ability to answer question re primary job duty .5
3/4/2016	JP	0.3	dg/md/ and for part of time MR, JP, ME - call to possible expert to inquire as to his credentials and ability to answer question re primary job duty .5
3/4/2016	ME	0.2	telephone call with opt-in regarding [questions] for discovery .1; notes from conversation .1
3/4/2016	MR	0.1	read JP email account of current plaintiffs displaced from their jobs
3/4/2016	MD	0.5	dg/md/ and for part of time MR, JP, ME - call to possible expert to inquire as to his credentials and ability to answer question re primary job duty .5
3/4/2016	ME	0.1	prepare opt-in's documents for discovery by reviewing and bates stamping
3/4/2016	MD	0.1	MD/MR discuss progress on find expert witnesses
3/4/2016	ME	0.1	download discovery produced by defense counsel
3/4/2016	MR	0.1	dg/md/ and for part of time MR, JP, ME - call to possible expert to inquire as to his credentials and ability to answer question re primary job duty .1
3/4/2016	MR	0.1	MD/MR discuss progress on find expert witnesses
3/4/2016	JS	0.1	left vm re depo scheduling
3/4/2016	MD	0.3	MD/ME review process for creating list of opt-in discovery to send to defense counsel
3/4/2016	ME	0.2	telephone call from opt-in regarding discovery
3/4/2016	ME	0.1	left voicemail for opt-in regarding [questions] for discovery
3/4/2016	ME	0.3	MD/ME review process for creating list of opt-in discovery to send to defense counsel
3/4/2016	MR	2.3	investigate issues with last two email productions 2.0, email MD about deficiencies with each production .3
3/4/2016	ME	0.7	download and save new responses to [questions]s for opt-in discovery .3; update tracking spreadsheet to indicate status of opt-in documents .4
3/4/2016	ME	0.1	left voicemail for opt-in regarding [questions] for discovery
3/4/2016	ME	0.2	telephone call from opt-in regarding [questions] for discovery .1; notes from conversation .1
3/4/2016	ME	0.3	telephone call with opt-in regarding discovery .2; notes from conversation .1
3/4/2016	ME	0.2	MR/ME discuss possible expert witnesses to reach out to
3/4/2016	ME	0.1	email opt-in new [questions] for discovery
3/4/2016	CLER	2.1	create PDF format of documents recd from client (discovery documents)
3/4/2016	JF	0.2	Call from claimant regarding the case update 0.2
3/4/2016	MR	0.2	MR/ME discuss possible expert witnesses to reach out to
3/4/2016	ME	0.2	email opt-in information about discovery and severance concerns that were resolved in 2013
3/6/2016	MR	2.5	perform further research on possible expert witnesses 2.2, send detailed email to team about research .3

Date	Staff	Amount of Time	Description
3/6/2016	MR	0.1	send [expert witness] bio to JP and ME
3/7/2016	MD	2	researching additional kellogg employees to depose 2.0
3/7/2016	ME	0.6	MD/JP/DG(in part)/ME review status of opt-in discovery and list to send to defense counsel .1; determine tasks needed to complete by end of the week .2; discuss information needed for filing .2; review information about retaliation
3/7/2016	ME	0.8	compile list of opt-ins for paralegal JF to call regarding discovery
3/7/2016	ME	0.6	download new [questions] responses for discovery .3; update tracking spreadsheet to indicate who completed [questions] and their document status .3
3/7/2016	MD	0.2	responding to defense counsel re depositions of named plaintiffs 0.2
3/7/2016	JF	0.1	Call to claimant regarding [questions] completion 0.1
3/7/2016	ME	0.2	JP/ME review tasks needed to complete for opt-in discovery
3/7/2016	MD	1	reviewing discovery production, preparing email, and exhibit to send to defense counsel re opt-ins 1.0
3/7/2016	ME	1.1	update opt-in discovery tracking spreadsheet to indicate who has completed discovery
3/7/2016	ME	0.1	email opt-in regarding discovery
3/7/2016	ME	0.1	listen to voicemail from opt-in
3/7/2016	MD	0.3	prepare for call with attorneys representing stores for subpoenas 0.3
3/7/2016	ME	0.2	determine who sent email with no signature regarding discovery .1; update spreadsheet with new responses regarding discovery documents .1
3/7/2016	JS	0.4	call with plt to confirm depo date
3/7/2016	ME	0.1	update opt-in discovery tracking spreadsheet to indicate documents recently received by opt-ins
3/7/2016	ME	0.2	review opt-in's discovery documents
3/7/2016	ME	0.2	send final email to opt-ins regarding discovery
3/7/2016	JF	0.1	Leave Voicemail for claimant to call us back regarding the [questions] 0.1
3/7/2016	ME	1.3	compile list of opt-in's who need to receive final email regarding completing discovery
3/7/2016	MD	0.2	email potential experts 0.2
3/7/2016	MD	0.1	email expert re fees/contract 0.1
3/7/2016	JF	0.1	Contact claimant via email to fill out case [questions] 0.1
3/7/2016	JP	0.1	JP/ME review status of opt-in's discovery
3/7/2016	ME	0.1	MR/ME determine location to save opt-in's emails
3/7/2016	MR	0.1	MR/ME determine location to save opt-in's emails
3/7/2016	ME	0.1	save opt-in's discovery document
3/7/2016	MD	0.5	calling attorneys representing stores re subpoenas 0.5
3/7/2016	JS	0.6	research flights for MD--MO and IL depositions
3/7/2016	JF	0.1	Call to claimant regarding the documents [questions] 0.1
3/7/2016	ME	0.5	compile emails from opt-in that need to be reviewed by MD
3/7/2016	JS	0.2	eml to plt re depo scheduling dates
3/7/2016	ME	0.2	determine if amount of time left in defendant's deposition has been calculated
3/7/2016	ME	0.1	JP/ME review status of opt-in's discovery
3/7/2016	ME	0.2	review status of opt-in discovery
3/7/2016	JF	0.1	Send email regarding suvery completion for claimant to call us back 0.1
3/7/2016	ME	0.5	compile list of opt-ins who have no responsive discovery documents
3/7/2016	ME	1.2	send final email to opt-ins regarding discovery
3/7/2016	MD	0.4	edit letter to defense counsel and send re outstanding discovery 0.4

Date	Staff	Amount of Time	Description
3/7/2016	JF	0.1	Leave Voicemail for claimant to call us back regarding [questions] 0.1
3/7/2016	JF	0.1	Send email to claimant regarding [questions] completion 0.1
3/7/2016	ME	0.3	create list of opt-in discovery status to be sent to defense counsel
3/7/2016	MD	0.2	email defense counsel re depositions of opt-ins 0.2
3/7/2016	MR	0.4	compose and email to tema 2nd writeup on follow-up work for possible expert
			MD/JP/DG(in part)/ME review status of opt-in discovery and list to send to defense counsel .1; determine tasks needed to complete by end of the week .2; discuss
3/7/2016	MD	0.6	information needed for filing .2; review information about retaliation
3/7/2016	JF	0.1	Send email to claimant regarding [questions] completion 0.1
			Create PDF format of document recd from D. (Motion for reconsideration of Order
3/7/2016	CLER	0.1	compelling Production of Willard Bishop Study)
3/7/2016	JS	0.2	call with plt re avail for depo
3/7/2016	ME	0.1	send email to opt-in regarding discovery
			MD/JP/DG(in part)/ME review status of opt-in discovery and list to send to defense counsel .1; determine tasks needed to complete by end of the week .2; discuss
3/7/2016	JP	0.6	information needed for filing .2; review information about retaliation
3/7/2016	JF	0.1	Call to claimant regarding [questions] 0.1
			MD/JP/DG(in part)/ME review status of opt-in discovery and list to send to defense counsel .1; determine tasks needed to complete by end of the week .2; discuss
3/7/2016	DG	0.2	information needed for filing .2; review information about retaliation
3/8/2016	ME	0.2	email opt-in instructions for sending secure files to our office
3/8/2016	ME	0.2	telephone call with intake regarding joining the case .1; notes from conversation .1
3/8/2016	ME	0.2	telephone call from opt-in regarding retaliation concerns
3/8/2016	ME	0.2	download discovery documents produced by defense counsel
3/8/2016	ME	0.2	file discovery documents produced by defense counsel last week
3/8/2016	ME	0.1	reply to opt-in's email regarding retaliation concerns
			calling and speaking with clients about dates/times/locations of work in various box chain
3/8/2016	MD	4.5	stores 4.5
3/8/2016	ME	0.1	review status of new responses to [questions]s for opt-in discovery
			respond to email concerning documents needed to respond to defendant's discovery
3/8/2016	KW	0.2	demands .1 update case notes .1
3/8/2016	MD	0.2	call with Price Chopper attorney
3/8/2016	ME	0.1	left voicemail to opt-in to follow up about retaliation concerns
			respond to email concerning documents needed to respond to defendant's discovery
3/8/2016	KW	0.2	demands .1 update case notes .1
3/8/2016	MD	0.1	md email defense counsel re completed discovery 0.1
			Telephone call from opt-in regarding recent [questions] he received and his current work
3/8/2016	AN	0.2	status at Kellogg.
			MD/ME discuss email and attachment to send to defense counsel regarding opt-ins'
3/8/2016	ME	0.2	completed discovery
3/8/2016	CLER	2.1	create PDF format of documents recd from client (discovery documents)
3/8/2016	MD	0.5	creating list of additional depositions to complete 0.5
3/8/2016	ME	0.6	calculate time remaining for defendant's deposition
			review and prepare exhibits to send to defense counsel re production of opt-in discovery
3/8/2016	MD	0.3	0.3
3/8/2016	ME	0.1	save opt-in's discovery document

Date	Staff	Amount of Time	Description
3/8/2016	ME	0.2	resend documents previously produced to defense counsel per their request
3/8/2016	MD	0.2	draft agenda for team meeting 0.2
3/8/2016	JF	0.2	Call from claimant regarding documents submission deadline 0.2
3/8/2016	ME	0.2	update opt-in discovery tracking spreadsheet to indicate documents recently recieved by opt-ins
3/8/2016	MD	0.2	MD/ME discuss email and attachment to send to defense counsel regarding opt-ins'
3/8/2016	ME	0.1	completed discovery review/edit email and attachment to send to defense counsel regarding opt-ins'
3/8/2016	JF	0.2	Call to claimant regarding documents [questions] 0.2
3/8/2016	ME	0.1	returned telephone call to opt-in regarding case update
3/8/2016	MD	0.3	edit contract with expert 0.3
3/9/2016	JS	0.5	research and book hotel for AZ deposition
3/9/2016	DG	0.7	draft outline of issues for expert .7
3/9/2016	MR	1	read email from JP about plaintiff willing to video his workday .1, research possible options for camera .7, send two emails to team about issue .2
3/9/2016	DG	2.3	DG/MD/JP/MR/ME review status of opt-in discovery .2; discuss possible people to depose .8; review paralegal role in preparing documents trial .4 discuss draft contract for expert witness .2; review outstanding discovery .5; discuss deposition for retaliation concerns .2
3/9/2016	MD	2.3	DG/MD/JP/MR/ME review status of opt-in discovery .2; discuss possible people to depose .8; review paralegal role in preparing documents trial .4 discuss draft contract for expert witness .2; review outstanding discovery .5; discuss deposition for retaliation concerns .2
3/9/2016	MR	2.3	DG/MD/JP/MR/ME review status of opt-in discovery .2; discuss possible people to depose .8; review paralegal role in preparing documents trial .4 discuss draft contract for expert witness .2; review outstanding discovery .5; discuss deposition for retaliation concerns .2
3/9/2016	JP	2.3	DG/MD/JP/MR/ME review status of opt-in discovery .2; discuss possible people to depose .8; review paralegal role in preparing documents trial .4 discuss draft contract for expert witness .2; review outstanding discovery .5; discuss deposition for retaliation concerns .2
3/9/2016	ME	0.4	file opt-in documents that have been bates stamped to prepare for sending to defense counsel
3/9/2016	ME	0.3	prepare opt-in documents to produce to defense counsel by zipping into files .2; send to defense counsel .1
3/9/2016	MR	0.3	MR/ME extract and save defendant's video production
3/9/2016	ME	0.3	MR/ME extract and save defendant's video production
3/9/2016	MR	3.5	investigate issues with KSTARS data
3/9/2016	MD	0.1	md/me discussing next steps in opt-ins discovery responses 0.1
3/9/2016	JP	0.1	JP/ME review status of opt-in's discovery responses
3/9/2016	ME	0.1	JP/ME review status of opt-in's discovery responses
3/9/2016	ME	0.4	verify that all opt-in documents recently provided to us have been tracked
3/9/2016	JS	0.2	save travel itineraries for MD for TX, AZ, and MO depos
3/9/2016	MD	1.5	digest Oldre deposition 1.5
3/9/2016	ME	0.1	MD/ME review responsiveness of opt-in's documents
3/9/2016	DG	0.3	md/dg/ms discussing issues to discuss with expert and potential costs 0.3
3/9/2016	ME	0.1	JF/ME review task for verifying the production of opt-in documents
3/9/2016	JF	0.1	JF/ME review task for verifying the production of opt-in documents
3/9/2016	CLER	2	create PDF format of documents recd from client (discovery documents)



Date	Staff	Amount of Time	Description
3/9/2016	MS	0.3	md/dg/ms discussing issues to discuss with expert and potential costs 0.3
3/9/2016	CLER	0.1	create PDF format of documents recd from client (discovery documents)
3/9/2016	MD	0.2	send ET documents re potential expert 0.2
3/9/2016	MD	0.1	MD/ME review responsiveness of opt-in's documents
3/9/2016	MD	0.3	md/dg/ms discussing issues to discuss with expert and potential costs 0.3
3/9/2016	JF	0.4	Verify the production of opt-in documents 0.4
3/9/2016	ME	0.1	md/me discussing next steps in opt-ins discovery responses 0.1
			DG/MD/JP/MR/ME review status of opt-in discovery .2; discuss possible people to depose .8; review paralegal role in preparing documents trial .4 discuss draft contract for expert
3/9/2016	ME	2.3	witness .2; review outstanding discovery .5; discuss deposition for retaliation concerns .2
3/9/2016	JS	0.1	update day sheet with new depo information
3/9/2016	JS	0.1	update day sheet with new depo information
3/9/2016	ME	1	review status of opt-in discovery responses
3/9/2016	JS	0.1	update day sheet with new depo information
3/9/2016	ME	0.3	MR/ME extract and save defendant's video production
3/9/2016	MD	0.1	md/mr discussing md need to review kellogg's documents on separate computer 0.1
3/9/2016	JS	0.1	update day sheet with new depo information
3/9/2016	ME	0.1	calculate number of opt-ins whose discovery is incomplete
3/9/2016	JS	0.1	update day sheet with new depo information
3/9/2016	MD	1.1	call with defense counsel re outstanding discovery 1.1
3/9/2016	ME	0.5	file opt-in documents that were produced to defense counsel today
3/9/2016	JS	0.1	update day sheet with new depo information
3/9/2016	JS	0.1	update day sheet with new depo information
3/9/2016	MR	0.1	md/mr discussing md need to review kellogg's documents on separate computer 0.1
			prepare opt-in's documents for production to defense counsel by reviewing .5; bates
3/10/2016	ME	1.5	stamping .5; and redacting privilege information .5
3/10/2016	CLER	0.2	prepare mailing client (return of org. documents)
3/10/2016	ME	0.2	investigate discrepancies in data regarding opt-in discovery
3/10/2016	AN	0.1	Telephone call from opt-in
			review prior request for production of KSTARS with regard to descriptions of columns and codes .2, review formatting instructions in ESI protocol .2, compose memo describing in
3/10/2016	MR	1.6	detail the problems with KSTARS data 1.2
3/10/2016	MS	0.3	prepare outline for expert call
			md/mr call with Kellogg IT and defense counsel paralegal re problems with ESI production
3/10/2016	MD	0.5	05
			md/ms call with potential expert, discussing benefits of expert, and discovery needs for
3/10/2016	MD	2	case 2.0
3/10/2016	ME	0.1	send email to opt-in regarding discovery documents
3/10/2016	MS	0.4	draft email to J Boudreau re 30(b)(6) timing, including legal research
3/10/2016	ME	0.1	send email to opt-in regarding discovery documents
3/10/2016	JF	1.9	Verify that opt-in has no responsive documents 1.9
			md/mr call with Kellogg IT and defense counsel paralegal re problems with ESI production
3/10/2016	MR	0.5	05
3/10/2016	ME	0.5	track opt-in discovery documents produced to defense counsel yesterday
3/10/2016	CLER	1	create PDF format of documents recd from client (discovery documents)
3/10/2016	JK	0.5	JK/MR discuss and research methods for camera recording of work day

Date	Staff	Amount of Time	Description
			attempted contact with plaintiff to satisfy defendant's discovery demands .1 add
3/10/2016	KW	0.3	information to case notes .1 update tracking spreadsheet .1
3/10/2016	MR	0.1	read email from MD and reply with edit to memo about KSTARS data
			JLP/MD/KW discuss information needed form current employees to proceed with
3/10/2016	MD	0.4	subpoena for trial preparation .4
3/10/2016	ME	0.3	review answer to interrogatories to prepare for sending to defense counsel
			JLP/MD/KW discuss information needed form current employees to proceed with
3/10/2016	JP	0.4	subpoena for trial preparation .4
			interview of plaintiff to gather informatin needed to prepare to subpoena store videos to
3/10/2016	KW	0.7	prepare for trial .5 add information to spreadsheet .1 update case notes .1
			research case information to get up to speed re contacts with this plaintiff .1 telephone
3/10/2016	KW	0.3	call to gather information .1 add information to case notes .1
			telephone call with opt-in regarding [questions] for discovery 1.; notes from conversation
3/10/2016	ME	0.2	.1
			JLP/KW meet to review contacts needed to complete response to defendant's discovery
3/10/2016	KW	0.3	demands
			md/ms call ET re issue expert will address, ET invovlement with summary judgment
3/10/2016	MS	0.9	briefing, and outstanding discovery issues in case 0.9
3/10/2016	ME	0.1	attempted to contact unresponsive opt-in about discovery
3/10/2016	JF	1.9	Verify opt-in discovery responses regarding documents 1.9
			research contact information, notes of previous contacts and information needed to
3/10/2016	KW	0.1	prepare for interview to satisfy defnedant's discovery demands .
			JLP/MD/KW discuss information needed form current employees to proceed with
3/10/2016	KW	0.4	subpoena for trial preparation .4
3/10/2016	MR	0.1	suggest further edit to memo about KSTARS
3/10/2016	ME	0.3	file opt-in discovery documents produced to defense counsel today
3/10/2016	MR	0.9	work on converting data.dat load file to excel compatible data .7, examine load file .2
3/10/2016	MR	0.5	JK/MRdiscuss and research methods for camera recording of work day
			MD/KW review information gathered from plaintiffs regarding work duties and times in
3/10/2016	MD	0.3	stores to prepare subpoenas for store video feeds .3
			telephone call to schedule appointment to discuss current work hours and job duties .1
3/10/2016	KW	0.3	add information to case ntoes .1 email information to attorney and lead paralegal .1
			MD/KW review information gathered from plaintiffs regarding work duties and times in
3/10/2016	KW	0.3	stores to prepare subpoenas for store video feeds .3
3/10/2016	MD	1.1	md/ms discuss topics to cover with expert for report and ET for summary judgment 1.1
3/10/2016	ME	0.1	telephone call with opt-in to verify receipt of documents
3/10/2016	ME	0.2	attempt to contact opt-in about discovery via phone
3/10/2016	ME	0.1	telephone call with opt-in regarding sending documents to our office
3/10/2016	MR	0.2	dg/mr/jp discuss MS taking Kellogg case responsibilities .2
			interview about plainitff's curent work situation at Kellogg .4 add information tocase
3/10/2016	KW	0.7	notes .1 email summary to attorney .1 add information to Tracking spreadsheet .1
3/10/2016	JP	0.2	dg/mr/jp discuss MS taking Kellogg case responsibilities .2

Date	Staff	Amount of Time	Description
3/10/2016	MR	1.1	confirm that text files from Defendant's email production on the hard drive had not copied over to the fileserver .2, start process to copy those files to fileserver .2, check on process several times .4, research bitlocker time-out aspect as possible problem .3
3/10/2016	ME	0.2	update opt-in discovery tracking spreadsheet to indicate documents produced to defense counsel today
3/10/2016	KW	0.3	telephone call to schedule interview about current job duties and hours .1 add information to case notes .1 update Tracking spreadsheet .1
3/10/2016	MS	0.3	dg/ms discuss MS taking Kellogg case responsibilities .3
3/10/2016	JF	0.2	JF/ME review task of verifying that opt-in has no responsive documents
3/10/2016	KW	0.3	telephone call to schedule interview appointment .1 add information to case notes .1 update tracking spreadsheet .1
3/10/2016	MD	0.3	create chart and list of stores for KW to find out information about for subpoena 0.3
3/10/2016	DG	0.2	dg/mr/jp discuss MS taking Kellogg case responsibilities .2
3/10/2016	ME	1.6	prepare opt-in discovery documents for production to defense counsel by reviewing .7; bates stamping .5; and redacting privilege information .4
3/10/2016	AG	0.1	conduct person search for current contact information
3/10/2016	JS	0.2	call and email to deponent to confirm depo scheduling
3/10/2016	JS	0.2	call and email to deponent to confirm depo scheduling
3/10/2016	ME	0.1	md/me discussing responding to Kellogg's document demands 0.1
3/10/2016	AG	0.1	conduct person search for current contact information
3/10/2016	KW	0.6	research case notes and telephone plaintiffs to update records regarding if they are current employees or not
3/10/2016	MS	0.1	Outside Sales briefing to ET
3/10/2016	JP	0.3	JLP/KW meet to review contacts needed to complete response to defendant's discovery demands
3/10/2016	DG	1	draft statement as to non-dismissal 1
3/10/2016	JS	0.2	call and email to deponent to confirm depo scheduling
3/10/2016	ME	0.3	prepare opt-in's discovery documents for production by reviewing .1; and bates stamping .2
3/10/2016	KW	0.2	JLP/KW review plaintiff list of current employees to identify persons to call .1 discuss issues to explore with plaintiffs to gather information needed .1
3/10/2016	ME	0.1	JF/ME review verification of opt-in discovery responses regarding documents
3/10/2016	ME	0.1	prepare and send files to defense counsel
3/10/2016	ME	0.2	JF/ME review task of verifying that opt-in has no responsive documents
3/10/2016	JS	0.2	call with opt-in re depo scheduling-- discussed current situation w/r/t reorg and ees leaving company
3/10/2016	MR	0.2	order new laptop for use with Kellogg case as calculations have become too complex for current laptops
3/10/2016	JS	0.2	call and email to deponent to confirm depo scheduling
3/10/2016	DG	0.3	dg/ms discuss MS taking Kellogg case responsibilities .3
3/10/2016	MS	1.1	md/ms discuss topics to cover with expert for report and ET for summary judgment 1.1
3/10/2016	JF	0.5	JF/ME redact and bates stamp opt-in discovery documents
3/10/2016	JS	0.2	call and email to deponent to confirm depo scheduling
3/10/2016	MS	2	md/ms call with potential expert, discussing benefits of expert, and discovery needs for case 2.0
3/10/2016	MD	0.1	md/me discussing responding to Kellogg's document demands 0.1

Date	Staff	Amount of Time	Description
3/10/2016	MD	0.9	md/ms call ET re issue expert will address, ET involvement with summary judgment briefing, and outstanding discovery issues in case 0.9
3/10/2016	JP	0.2	JLP/KW review plaintiff list of current employees to identify persons to call .1 discuss issues to explore with plaintiffs to gather information needed .1
3/10/2016	KW	0.3	interview to gather current information regarding job title and job duties .2 add information to case notes .1
3/10/2016	MD	0.3	review,edit, and send email to defense counsel about deficient KSTARS data 0.3
3/10/2016	ME	0.1	track documents recently received from opt-ins
3/10/2016	JS	0.2	call and email to deponent to confirm depo scheduling
3/10/2016	ME	0.5	JF/ME redact and bates stamp opt-in discovery documents
3/10/2016	JS	0.2	call and email to deponent to confirm depo scheduling
3/10/2016	ME	0.2	telephone call from opt-in regarding case update .1; notes from conversation .1
3/10/2016	JF	0.1	JF/ME review verification of opt-in discovery responses regarding documents 0.1
3/11/2016	MR	0.6	read and reply to email thread and compose and send multiple follow-up emails regarding camera for possible video of plaintiff workday .5, research audio component to camera .1
3/11/2016	ME	0.5	MD/JP/ME review plan to respond to defendant's opt-in discovery non-responder list update opt-in discovery tracking spreadsheet to indicate rogs produced to defense
3/11/2016	ME	0.2	counsel yesterday
3/11/2016	ME	0.2	bates stamp opt-in's documents to prepare for production to defense counsel
3/11/2016	AN	0.1	Telephone call from opt-in
3/11/2016	DG	0.5	edit joint statement re dismissal .5
3/11/2016	ME	0.1	prepare opt-in's documents for production to defense counsel by bates stamping
3/11/2016	AG	0.3	prepare service on Tops Markets (Subpoena Certified Return Receipt USPS)
3/11/2016	CLER	0.3	send opt-in discovery documents to defense counsel .1; file documents .1; update tracking spreadsheet
3/11/2016	MD	0.5	MD/JP/ME review plan to respond to defendant's opt-in discovery non-responder list
3/11/2016	JP	0.5	MD/JP/ME review plan to respond to defendant's opt-in discovery non-responder list
3/11/2016	MR	0.6	review copy of large set of text files from Def production on hard drive to fileserver .1, configure and start DTSeach indexing on dataset .4, email to para ME about indexing .1
3/11/2016	JF	1.2	Verify opt-in discovery responses regarding documents 1.2
3/11/2016	MD	0.1	MD/ME review plaintiff's response to defendant's nonresponsive opt-in list
3/11/2016	MD	0.3	md/mr discussing mr call with defense counsel IT and how to use KSTARs/TSR/PTM pay data 0.3
3/11/2016	ME	0.1	MR/ME review status of defendant's email production
3/11/2016	ME	0.1	ME/JF Review the completed task to track incomplete discovery for opt-ins 0.1
3/11/2016	ME	2.1	provide feedback on defendant's list of discovery non-responders to prepare to send to defense counsel
3/11/2016	JK	0.5	JK review KSTAR production to determine if there is anyway to work with the data in its faulty state
3/11/2016	ME	0.1	MD/ME review plaintiff's response to defendant's nonresponsive opt-in list
3/11/2016	MR	0.3	md/mr discussing mr call with defense counsel IT and how to use KSTARs/TSR/PTM pay data 0.3

Date	Staff	Amount of Time	Description
3/11/2016	JF	0.1	ME/JF Review the completed task to track incomplete discovery for opt-ins 0.1
3/11/2016	ME	0.2	review defendant's list of opt-in nonresponders to discovery
3/11/2016	MR	0.2	email to team about possible camera to use for plaintiff to video workday
3/11/2016	ME	0.7	review status of contact made to opt-ins
3/11/2016	ME	0.1	resend answer to interrogatories produced yesterday to defense counsel
3/11/2016	ME	1	compile list of opt-ins to receive final contact regarding outstanding discovery
3/11/2016	ME	0.4	review status of opt-in discovery
3/11/2016	JS	0.2	update day sheet reflecting flight information
3/11/2016	ME	0.2	telephone call with opt-in regarding [questions] for rog
3/11/2016	JS	0.2	update day sheet reflecting flight information
3/11/2016	ME	0.1	left voicemail for opt-in regarding discovery
3/11/2016	ME	0.3	download and save new responses to opt-in discovery [questions]
3/11/2016	ME	0.2	begin to review draft statement regarding non-dismissal
3/11/2016	JS	0.1	update day sheet with location and time of depo
3/11/2016	MR	0.1	add atty MS to case group distribution list .1
3/11/2016	JS	0.1	update day sheet with location and time of depo
3/11/2016	ME	0.2	email opt-in answer to interrogatories for review and instructions for completing discovery
3/11/2016	ME	0.1	bates stamp opt-in's documents to prepare for production to defense counsel
3/14/2016	JF	0.6	Review the case proof chart (per JLP) 0.6
3/14/2016	MS	0.5	tc w/ ET re sj and class cert briefing
3/14/2016	MS	0.3	tc w/ potential expert
3/14/2016	ME	0.2	compile list of opt-ins who need an amended rog
3/14/2016	AG	0.2	Prepare motion for admission pro hac vice (Sweeney)
3/14/2016	ME	0.2	telephone call from opt-in regarding case update
3/14/2016	MS	1.7	review and annotate Salmon deposition
3/14/2016	MR	2.6	work on amended rogs project involving about 240 plaintiffs
3/14/2016	MR	0.8	work on creating new rogs about several plaintiffs
3/14/2016	MD	1	call with defense counsel about outstanding discovery 1.0
3/14/2016	MS	2.3	MS/MD/JP/JF/MR(in part)/ME review upcoming deadlines .2; discuss completion of discovery of plaintiffs .8; review steps needed to complete discovery of Kellogg .9; review pending and upcoming motions .2; update regarding latest settlement discussion .2
3/14/2016	ME	1.3	update opt-in discovery tracking spreadsheet to include newly received information about opt-in's document status
3/14/2016	JP	0.1	JK/ME/MR confer about Kellogg folder structure project .1
3/14/2016	ME	0.1	JK/ME/MR confer about Kellogg folder structure project .1
3/14/2016	ME	0.3	download and save new [questions] responses for discovery [questions]
3/14/2016	JF	1.3	JP/JF Overview of the case/recent developments 0.9 Overview of the Happy Camper project to research individual testimonies for information related to sales 0.4
3/14/2016	MR	0.3	Kellogg folder structure project: read email from MD .1, read email from JP .1, examine folder structure .1
3/14/2016	ME	0.2	MD/ME review steps needed to complete opt-in discovery
3/14/2016	ME	2.3	MS/MD/JP/JF/MR(in part)/ME review upcoming deadlines .2; discuss completion of discovery of plaintiffs .8; review steps needed to complete discovery of Kellogg .9; review pending and upcoming motions .2; update regarding latest settlement discussion .2
3/14/2016	ME	0.1	draft email to opt-ins to review amended answer to interrogatories
3/14/2016	MD	0.2	MD/ME review steps needed to complete opt-in discovery

Date	Staff	Amount of Time	Description
3/14/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#250 -STIPULATION Stipulated Dismissal of Plaintiffs' Fourteenth Cause of Action by parties (Nelson, James)
3/14/2016	JP	1.3	JP/JF Overview of the case/recent developments 0.9 Overview of the Happy Camper project to research individual testimonies for information related to sales 0.4
3/14/2016	CM	0.5	JF/CM review how to use DTsearch (.5)
3/14/2016	ME	0.1	save opt-in's discovery document
3/14/2016	JF	2.3	MS/MD/JP/JF/MR(in part)/ME review upcoming deadlines .2; discuss completion of discovery of plaintiffs .8; review steps needed to complete discovery of Kellogg .9; review pending and upcoming motions .2; update regarding latest settlement discussion .2
3/14/2016	MR	0.1	JK/ME/MR confer about Kellogg folder structure project .1
3/14/2016	JF	0.5	JF/CM review how to use DTsearch (.5)
3/14/2016	JP	2.3	MS/MD/JP/JF/MR(in part)/ME review upcoming deadlines .2; discuss completion of discovery of plaintiffs .8; review steps needed to complete discovery of Kellogg .9; review pending and upcoming motions .2; update regarding latest settlement discussion .2
3/14/2016	MD	2.3	MS/MD/JP/JF/MR(in part)/ME review upcoming deadlines .2; discuss completion of discovery of plaintiffs .8; review steps needed to complete discovery of Kellogg .9; review pending and upcoming motions .2; update regarding latest settlement discussion .2
3/14/2016	JF	0.3	Calls to claimants to request verbal permission to amend ROGs 0.3
3/14/2016	ME	0.1	listen to voicemail from opt-in
3/14/2016	JP	0.2	JP/MR discuss process for training para newly joining case team
3/14/2016	MR	0.2	JP/MR discuss process for training para newly joining case team
3/14/2016	MD	0.1	MD/MR confer on phone question about amended rogs .1
3/14/2016	MR	0.1	MD/MR confer on phone question about amended rogs .1
3/14/2016	JF	0.1	Update contact information for claimant 0.1
3/15/2016	MD	0.1	MD/MR discuss excluded opt-ins issue
3/15/2016	MD	0.3	MD/KW/JF review depo digest task 0.3
3/15/2016	ME	0.1	telephone call with opt-in regarding discovery documents
3/15/2016	KW	0.3	MD/KW/JF review depo digest task 0.3
3/15/2016	MR	0.1	MD/MR discuss excluded opt-ins issue
3/15/2016	ME	0.2	telephone call with opt-in regarding discovery documents
3/15/2016	MD	0.3	send defense counsel rog responses 0.3
3/15/2016	ME	0.1	ME/MR discuss next steps in rogs and docs project, i.e. mutual statement from Def and Plt
3/15/2016	ME	0.3	telephone call from opt-in regarding amended rog
3/15/2016	MR	0.1	ME/MR discuss next steps in rogs and docs project, i.e. mutual statement from Def and Plt
3/15/2016	ME	0.1	ME/MR review finished version of linkage between tracking sheet and Def/Plt listing
3/15/2016	MD	0.3	review spreadsheet re non-responders 0.3
3/15/2016	MS	1.5	md/ms discussing kellogg next steps and outline for 30b6 dep 1.5
3/15/2016	MR	0.3	install dtsearch on para JF's workstation for case document searching
3/15/2016	MR	1.2	do name matchup to pull into unique identifiers into Def/Plt rog/doc list .5, create lookup tables from tracking list to rog/doc list .7
3/15/2016	KW	0.1	update case notes regarding daily job duties



Date	Staff	Amount of Time	Description
			MD/KW confer regarding format for deposition digest .2 review crucial information
3/15/2016	KW	0.4	needed .2
3/15/2016	ME	0.5	JP/MD/ME review status of opt-in discovery .3; discuss excluded opt-ins .2
3/15/2016	MR	0.1	ME/MR review finished version of linkage between tracking sheet and Def/Plt listing
3/15/2016	MR	0.1	JP/MR discuss work flow regarding case work
3/15/2016	MS	2.1	document review for 30(b)(6) depo
3/15/2016	JF	0.3	MD/KW/JF review depo digest task 0.3
3/15/2016	MR	0.3	JP/MR review overall process of interrogatory info collection
3/15/2016	MS	1.4	review and annotate Bussell deposition
3/15/2016	JP	0.1	JP/MR discuss work flow regarding case work
3/15/2016	JP	0.3	JP/MR review overall process of interrogatory info collection
3/15/2016	AN	0.2	ME/JF/AN Research correspondence from plt
3/15/2016	JS	0.1	fwd hotel reservation to MD for AZ depo
3/15/2016	JF	0.2	Call from claimant regarding documents 0.2
3/15/2016	ME	0.2	ME/MR review linkage needed between docs and rogs tracking sheet and Def/Plt listing
3/15/2016	ME	0.1	forward opt-in emails that need to be followed up with to JP
			MD/KW confer regarding format for deposition digest .2 review crucial information
3/15/2016	MD	0.4	needed .2
3/15/2016	MD	0.5	JP/MD/ME review status of opt-in discovery .3; discuss excluded opt-ins .2
3/15/2016	ME	0.1	listen to voicemail from opt-in
3/15/2016	JP	0.5	JP/MD/ME review status of opt-in discovery .3; discuss excluded opt-ins .2
3/15/2016	KW	3.5	create deposition digest 3.5
3/15/2016	KW	0.2	JLP/KW dsicussion of progress of Kellogg litigation to deemine what needs to be done .2
3/15/2016	JF	0.8	Study the proof chart 0.8
3/15/2016	MD	1.5	md/ms discussing kellogg next steps and outline for 30b6 dep 1.5
3/16/2016	MR	0.3	make first attempts at creating excel directory list of 10.4 BSN documents
3/16/2016	MR	0.1	MD/MR address problem in viewing trade videos on MD's workstation
3/16/2016	MR	0.2	JP/MD/MR discuss Def production reorganization process .2
3/16/2016	MD	2	drafting motion to compel 30b6 testimony 2.0
3/16/2016	MD	1.5	drafting letter to defense counsel re second depositions of named plaintiffs 1.5
3/16/2016	MR	0.2	JP/MR examine possible rogue email from Kellogg client
3/16/2016	MD	0.1	MD/MR address problem in viewing trade videos on MD's workstation
3/16/2016	JP	0.2	JP/MR examine possible rogue email from Kellogg client
			MD/MR multiple phone conversations about reorganize file structure of Defendant
3/16/2016	MR	0.2	production on server
			JP/MR examine various issues/problems with Defendant production file reorganization
3/16/2016	JP	0.7	on server
3/16/2016	JP	0.2	JP/MD/MR discuss Def production reorganization process .2
3/16/2016	JF	0.2	ME/JF/AN Research correspondence from plt
3/16/2016	MD	0.2	JP/MD/MR discuss Def production reorganization process .2
3/16/2016	MD	1.3	reviewing videos kellogg produced 1.3
3/16/2016	ME	0.2	ME/JF/AN Research correspondence from plt
			JP/MR examine various issues/problems with Defendant production file reorganization
3/16/2016	MR	0.7	on server

Date	Staff	Amount of Time	Description
3/16/2016	MR	0.3	email to para ME about scrubbing Def/Plt rogs/docs document and retaining unique identifiers .1, assist ME with preparing document to send to defendant .2
3/16/2016	MR	0.8	JP/ME/MR resolve process for reorganization of Defendant production
3/16/2016	JF	0.6	Review of the FLSA laws and regulations regarding outside sales exemption (in anticipation of Kellogg case work) 0.6
3/16/2016	MR	0.2	MD/MR discussed issues of CTS and status of excluded opt-ins
3/16/2016	MD	0.2	MD/MR multiple phone conversations about reorganize file structure of Defendant production on server
3/16/2016	MD	1.5	md editing motion re dismissal of ot-ins 1.5
3/16/2016	ME	0.8	JP/ME/MR resolve process for reorganization of Defendant production
3/16/2016	JP	0.8	JP/ME/MR resolve process for reorganization of Defendant production
3/16/2016	MD	0.2	md/dg discuss motion re dismissal of opt-ins 0.2
3/16/2016	MD	0.2	MD/MR discussed issues of CTS and status of excluded opt-ins
3/16/2016	MR	0.8	work on project to reorganize file structure of Defendant production on server
3/17/2016	KW	2.5	create deposition digest in prepeartion for trial 2.5
3/17/2016	MR	0.4	create excel list of Def Prod BSN file structure for future use in reconstructing production list .3, send email to Misty about excel list .1
3/17/2016	ME	0.1	reply to email from opt-in regarding discovery
3/17/2016	MR	0.2	begin archive/transfer of selected folders in 10.4 BSN for reorganization
3/17/2016	ME	0.2	telephone call from opt-in regarding restructuring
3/17/2016	JF	0.8	Read through happy camper testimonies to assess for information regarding sales and time 0.8
3/17/2016	MR	0.1	revise distribution email list for staffing changes
3/17/2016	ME	0.5	MD/ME review termination dates for opt-ins who defendants consider outside SOL
3/17/2016	MR	0.3	write up plan for reorganization of Defendant BSN documents
3/17/2016	MR	0.2	configure and begin selected set of files for archiving for file reorganization of Def production case folders
3/17/2016	MD	0.5	MD/ME review termination dates for opt-ins who defendants consider outside SOL
3/17/2016	MR	0.2	assist JF in creating OCR version of deposition pdf
3/17/2016	MR	0.2	begin timestamp preserved archive of Def production BSN for file structure reorganization
3/17/2016	JP	0.2	JLP/JF Review the task to track happy campers 0.1; Review the task to review happy camper declarations 0.1
3/17/2016	MS	0.8	review videos for depo prep
3/17/2016	JF	0.2	JP/JF Review the task to track happy campers 0.1; Review the task to review happy camper declarations 0.1
3/17/2016	MS	1.2	reivew Groulx time studies for 30(b)(6)
3/17/2016	KW	2.5	Complete deposition digest of deposition of named plaintiff 2.5
3/17/2016	KW	0.2	Review deposition digest and example to prepare to complete deposition digests for [client] and [client]
3/17/2016	MR	0.5	examine completed first set of archived files .1, configure and start second set of archiving for file reorganization .1, confirm second set completed archive .1, configure and start third set of archiving for file reorganization .2
3/17/2016	MR	2.7	continued work on folder reorganization of Def production 2.6, send email to team about completion of step 5 .1
3/17/2016	JF	0.2	Call to claimant to check on her medical condition (for the purposes of deposition) 0.2

Date	Staff	Amount of Time	Description
3/17/2016	ME	0.1	telephone call from opt-in regarding case update
3/17/2016	MR	0.3	check on progress of archive of BSN folder .1, note reason for archive process failure .1, email to team about files needing to be close for archive to complete .1
3/17/2016	JF	0.1	Request assistance with document conversion from MR to complete Happy Camper testimonies project 0.1
3/17/2016	AG	0.7	conduct search of track happy camper (WestLaw)
3/18/2016	ME	0.4	telephone call from opt-in regarding discovery documents .3; notes from conversation .1
3/18/2016	ME	2	prepare information for joint notice of non-response
3/18/2016	ME	0.1	email opt-in regarding discovery documents
3/18/2016	ME	0.1	download discovery documents sent by defense counsel
3/18/2016	ME	0.2	resend plaintiff discovery to defense counsel
3/18/2016	JF	3.8	Organize defendants' discovery documents for improved efficiency/accuracy 3.8
3/18/2016	ME	0.1	MD/ME review information about opt-in discovery needed for joint notice of non-response
3/18/2016	MD	0.1	MD/ME review information about opt-in discovery needed for joint notice of non-response
3/18/2016	ME	0.1	MD/ME review information needed for brief regarding dismissal of opt-ins
3/18/2016	ME	2.4	compare defendant's list of opt-in discovery non-responders to plaintiff's list
3/18/2016	MD	0.1	MD/ME review information needed for brief regarding dismissal of opt-ins
3/18/2016	DG	1.2	edit statement to attach to joint statement re why cannot dismiss nonparticipants 1.2
3/18/2016	ME	0.2	file discovery documents produced by defense counsel
3/18/2016	MD	0.5	MD/MS/MR/JF/ME review information needed for summary judgement motion and 30b6 deposition
3/18/2016	MS	0.5	MD/MS/MR/JF/ME review information needed for summary judgement motion and 30b6 deposition
3/18/2016	MR	0.5	MD/MS/MR/JF/ME review information needed for summary judgement motion and 30b6 deposition
3/18/2016	JF	0.5	MD/MS/MR/JF/ME review information needed for summary judgement motion and 30b6 deposition
3/18/2016	ME	0.4	review/edit draft joint notice of non-response
3/18/2016	ME	0.4	update opt-in deposition folders to include newly produced defendant and plaintiff discovery documents
3/18/2016	JS	0.3	discussion with plt about expectations re deposition
3/18/2016	ME	0.5	MD/MS/MR/JF/ME review information needed for summary judgement motion and 30b6 deposition
3/21/2016	AG	0.6	conduct leagel research (pull the briefing, replies, responses on the P. SJ in Campanelli v. Hershey Co., 765 F. Supp. 2d 1185, 1186 (N.D. Cal. 2011))
3/21/2016	ME	0.2	ME/JF review the tasks to 1. Perform DT Search in anticipation of the 30b6 depositions 2. Organize defendants' discovery documents 3. Contact Happy Campers 0.2
3/21/2016	JF	0.4	Arrange hotel accomodations for a claimant's deposition 0.4
3/21/2016	JF	0.1	MR/JF Review folder re-organization of the documents produced by the defendant 0.1
3/21/2016	JF	0.8	MS/JF/ME review process for compiling documents needed for 30b6 deposition

Date	Staff	Amount of Time	Description
3/21/2016	ME	0.2	MR/ME scrub draft joint notice of non-response of metadata to prepare to send to defense counsel
3/21/2016	JF	0.2	MD/JF Review the task to reach out to claimants to schedule their deposition preparation meetings 0.2
3/21/2016	ME	0.1	MS/ME review password for accessing defendant's discovery document
3/21/2016	JF	0.3	Call claimant to confirm deposition preparation timeframe 0.3
3/21/2016	MR	0.2	MR/ME scrub draft joint notice of non-response of metadata to prepare to send to defense counsel
3/21/2016	ME	0.1	reply to opt-in's email regarding discovery
3/21/2016	ME	0.2	JF/ME review location of emails produced by defense counsel
3/21/2016	MS	0.1	MS/ME review password for accessing defendant's discovery document
3/21/2016	MS	0.8	MS/JF/ME review process for compiling documents needed for 30b6 deposition
3/21/2016	JF	0.1	Email deposition prep materials to claimant 0.1
3/21/2016	ME	0.1	reply to opt-in's email regarding case update
3/21/2016	ME	0.2	MR/ME review DT search process for 30b6 deposition
3/21/2016	MS	0.2	MS/ME review defendant's updated list of non-responders for opt-in discovery
3/21/2016	ME	0.8	MS/JF/ME review process for compiling documents needed for 30b6 deposition
3/21/2016	JF	0.2	Call hotel to make sure claimant's accomodation arrangements are in order 0.2
3/21/2016	ME	0.2	MS/ME review defendant's updated list of non-responders for opt-in discovery
3/21/2016	ME	0.3	telephone call from opt-in about [questions] for discovery .2; notes from conversation .1
3/21/2016	ME	0.1	left voicemail for opt-in to follow up about discovery question opt-in had
3/21/2016	MD	0.6	travel from client's home to hotel 0.6
3/21/2016	AG	0.2	arrange Court Reporter for deposition ( Magna 3/29/2016)
3/21/2016	JF	0.1	Call from claimant regarding [questions] completion 0.1
3/21/2016	MD	3.5	prepare client for deposition 3.5
3/21/2016	JF	0.2	Call hotel to confirm hotel reservation for a deposed claimant 0.2
3/21/2016	MD	8.0	travel from office to Phoenix AZ for opt-in depositon (work on plane reviewing 8 documents) 8.0
3/21/2016	MD	0.2	MD/JF Review the task to reach out to claimants to schedule their deposition preparation meetings 0.2
3/21/2016	JF	0.1	Email claimant regarding case update 0.1
3/21/2016	JF	0.3	AG/JF(in part)/ME(in part) conduct leagel research (pull the briefing, replies, responses on the P. SJ in Campanelli v. Hershey Co., 765 F. Supp. 2d 1185, 1186 (N.D. Cal. 2011)
3/21/2016	MS	0.4	dg/ms discuss 30(b)(6) deposition re DSD and primary duty .4
3/21/2016	ME	0.1	reply to opt-in's email requesting case update
3/21/2016	JF	0.7	Organize defendants' discovery documents for improved efficiency/accuracy 0.7
3/21/2016	JF	0.2	ME/JF review the tasks to 1. Perform DT Search in anticipation of the 30b6 depositions 2. Organize defendants' discovery documents 3. Contact Happy Campers 0.2
3/21/2016	DG	0.4	dg/ms discuss 30(b)(6) deposition re DSD and primary duty .4
3/21/2016	ME	0.5	proof read brief for joint notice of non-response
3/21/2016	ME	0.1	reply to opt-in's email regarding discovery
3/21/2016	JF	0.1	Call defense council paralegal to confirm deposition timeframe (PST as opposed to MST) 0.1

Date	Staff	Amount of Time	Description
3/21/2016	DG	1.5	edit to joint statement re non-dsmissal 1; calls to Matt re same .1; emails to/from def re same .2; call with MS re K's position re joint statement .1; call with ME re K's position and timetable for dispute .1
3/21/2016	CLER	0.2	create PDF format of correspondence recd from Tops Market, LLC ( response to subpoena)
3/21/2016	MR	0.2	MR/ME review DT search process for 30b6 deposition
3/21/2016	MS	0.6	annotating 30(b)(6) notice as outline
3/21/2016	ME	0.7	AG/JF(in part)/ME(in part) conduct leagel research (pull the briefing, replies, responses on the P. SJ in Campanelli v. Hershey Co., 765 F. Supp. 2d 1185, 1186 (N.D. Cal. 2011)
3/21/2016	JF	0.2	Call to claimant to arrange deposition preparation details 0.2
3/21/2016	ME	0.1	email MS link to briefs located from legal research
3/21/2016	MR	0.1	MR/JF Review folder re-organization of the documents produced by the defendant 0.1
3/21/2016	MD	1.7	ms/md discuss 30(b)(6) topics and possible sources
3/21/2016	JF	1.7	Organize defendants' discovery documents for improved efficiency/accuracy 1.7
3/21/2016	ME	0.1	MD/ME discuss steps needed to complete joint notice of non-response
3/21/2016	MD	0.2	DG/MD/ME discuss final edits to joint notice of non-response prior to sending to defense counsel
3/21/2016	DG	0.2	DG/MD/ME discuss final edits to joint notice of non-response prior to sending to defense counsel
3/21/2016	ME	0.2	MR/ME review location of zip files of emails produced by defense counsel that need to be extracted
3/21/2016	ME	0.1	email link to deposition video to JF to send to client
3/21/2016	ME	0.2	DG/MD/ME discuss final edits to joint notice of non-response prior to sending to defense counsel
3/21/2016	MS	1.7	ms/md discuss 30(b)(6) topics and possible sources
3/21/2016	MD	0.2	MD/ME discuss sending joint notice of non-response to defense counsel
3/21/2016	JF	0.2	Call to claimant to confirm deposition preparation timeframe 0.2
3/21/2016	JF	0.2	JF/ME review location of emails produced by defense counsel
3/21/2016	MR	0.2	MR/ME review location of zip files of emails produced by defense counsel that need to be extracted
3/21/2016	ME	0.2	MD/ME discuss sending joint notice of non-response to defense counsel
3/21/2016	MS	0.2	review md outline on contract issues
3/22/2016	MS	0.3	review recent SCOTUS case for class cert burden
3/22/2016	MD	0.2	MD/ME discuss documents additional documents needed for opt-in deposition preparation
3/22/2016	ME	0.4	review opt-ins' [questions] responses to determine status of discovery
3/22/2016	ME	0.2	MD/ME discuss discovery doc situtation and evidence of production
3/22/2016	MD	0.2	MD/ME discuss discovery doc situtation and evidence of production
3/22/2016	ME	0.1	MD/ME discuss location of letter to defense counsel regarding outstanding discvoery
3/22/2016	MD	0.1	MD/ME discuss location of letter to defense counsel regarding outstanding discvoery
3/22/2016	MS	0.4	tc w/ OC re 30(b)(6); joint notice, dismissal argument; add'l plaintiffs depos
3/22/2016	MR	1.1	MR/JF Coordinate the task to perform DT Search of Defendant's management emails to prepare for 30b6 deposition 1.1
3/22/2016	ME	1.5	include links to documents in outline to prepare for 30b6 deposition

Date	Staff	Amount of Time	Description
3/22/2016	JF	4.8	Conduct DT Search of Defendant's Management emails to prepare for the 30b6 deposition 4.8
3/22/2016	JF	0.1	ME/JF Review Excel spreadsheet shortcuts in preparation for 30b6 deposition research (copy path, etc.) 0.1
3/22/2016	MS	0.2	email to OC about re-production of discovery Kellogg claims it did not receive
3/22/2016	ME	0.5	review status of opt-in discovery production
3/22/2016	KW	2.1	Complete Deposition Digest 2.1
3/22/2016	MS	0.2	review docs in prep for tc w/ OC re 30(b)(6); joint notice, dismissal argument; add'l plaintiffs depos
3/22/2016	MS	0.2	MS/KW review proof chart; discuss key point to highlight in deposition digests .2
3/22/2016	JF	0.8	Prepare keywords to effectively conduct DT SEarch of Denfendant's management emails 0.8
3/22/2016	MS	0.3	revise and circulate joint notice form
3/22/2016	ME	0.2	MR/ME discuss location indexes of defendant's email production
3/22/2016	MS	0.3	review SCOTUS Tyson Foods decision for incorporation into dismissal arguments
3/22/2016	KW	0.2	MS/KW review proof chart; discuss points to look for in deposition transcript to highlight in deposition digest .2
3/22/2016	MD	0.4	ms/md discuss strategy for 30(b)(6); plaintiffs' depos; joint statement; and dismissal argument
3/22/2016	AG	0.2	review ECF procedure on filing (Statement filed related to JSR)
3/22/2016	MS	0.4	ms/md discuss strategy for 30(b)(6); plaintiffs' depos; joint statement; and dismissal argument
3/22/2016	AG	0.1	MD/AG discussion on ECF (Statement filed related to JSR)
3/22/2016	MR	0.2	MR/ME discuss location indexes of defendant's email production
3/22/2016	MD	0.3	travel to deposition from hotel 0.3
3/22/2016	MD	0.1	MD/AG discussion on ECF (Statement filed related to JSR)
3/22/2016	KW	3.5	Produce a Deposition Digest
3/22/2016	MS	0.1	ms/dg discuss joint statement and discovery issues
3/22/2016	MD	0.4	ms/md discuss joint statement, 30(b)(6) issues, and discovery doc confusion
3/22/2016	MD	1.0	reviewing client documents for deposition 1.0
3/22/2016	MS	0.3	ms/me discuss discovery doc situtation and evidence of production
3/22/2016	JF	1.1	MR/JF Coordinate the task to perform DT Search of Defendant's management emails to prepare for 30b6 deposition 1.1
3/22/2016	DG	0.1	ms/dg discuss joint statement and discovery issues
3/22/2016	ME	0.2	MD/ME discuss documents additional documents needed for opt-in deposition preparation
3/22/2016	ME	0.1	email documents for deponents to MD
3/22/2016	MS	1.5	review Groulx depo and exhibits
3/22/2016	ME	0.2	MS/ME discuss outline for 30b6 deposition
3/22/2016	ME	0.1	ME/JF Review Excel spreadsheet shortcuts in preparation for 30b6 deposition research (copy path, etc.) 0.1
3/22/2016	MS	0.2	MS/ME discuss outline for 30b6 deposition
3/22/2016	ME	0.3	ms/me discuss discovery doc situtation and evidence of production
3/22/2016	MD	1.0	discuss case and deposition with client after deposition 1.0
3/22/2016	MS	0.4	MS/MR/MA meet to identify which documents were not received by Kellogg and how to ensure that def counsel receives them today
3/22/2016	MR	0.4	MS/MR/MA meet to identify which documents were not received by Kellogg and how to ensure that def counsel receives them today



Date	Staff	Amount of Time	Description
3/22/2016	ME	0.1	leave voicemail for opt-in to follow up with email from opt-in about discovery
3/22/2016	MA	0.4	MS/MR/MA meet to identify which documents were not received by Kellogg and how to ensure that def counsel receives them today
3/22/2016	MD	3	defend opt-in deposition 3.0
3/22/2016	ME	0.8	update joint list on non-responders for opt-in discovery
3/22/2016	MD	0.1	call with client about deposition prep .01
3/22/2016	MD	8	travel from Phoenix to Dallas for opt-in depositions 8.0
3/22/2016	MS	0.4	ms/md discuss joint statement, 30(b)(6) issues, and discovery doc confusion
3/23/2016	MR	0.5	MS/MR discuss use of workload model emails and motus info as one basis for damages
3/23/2016	JF	0.6	Locate PDF version of Kellogg Management email needed for the purposes of 30b6 deposition 0.6
3/23/2016	MR	0.2	examine emails identified yesterday relating to workload model
3/23/2016	MS	0.3	ms/md discuss inconsistencies in non-responder lists
3/23/2016	JF	0.4	Compile research for 30b6 deposition outline 0.4
3/23/2016	MS	0.3	email to MD re Swift position on depositions
3/23/2016	MD	0.3	ms/md discuss inconsistencies in non-responder lists
3/23/2016	JF	1.6	Compare defendant's records against our records to determine the plaintiffs who are excluded/outside of SOL 1.6
3/23/2016	MS	0.5	MS/MR discuss use of workload model emails and motus info as one basis for damages
3/23/2016	MD	3.3	prepare client for deposition 3.3
3/23/2016	MS	0.5	investigation of non-responders for Ex A and B to Joint Notice
3/23/2016	MS	0.7	negotiating joint notice re non response w/ OC
3/23/2016	MS	0.4	review results of DT search of mgt email productioni
3/23/2016	JF	1.5	Review documents to include in annotated outline to be used for 30b6 deposition 1.5
3/23/2016	JS	0.1	eml to plt re depo scheduling
3/23/2016	JF	0.1	Send CTS to MD 0.1
3/23/2016	MS	0.5	begin revising statement related to Joint Notice of Non Response
3/23/2016	DG	0.1	ms/dg discuss relevance of recent SCOTUS case to proof burden for class
3/23/2016	AG	0.1	emailed local counsel (copy of Sweeney PHV for filing)
3/23/2016	DG	0.2	ms/dg discuss discovery that Kellogg has not produced and its relevance for 30b6
3/23/2016	AG	0.1	PCF local counsel (status of Sweeney PHV filing)
3/23/2016	MS	0.1	ms/dg discuss relevance of recent SCOTUS case to proof burden for class
3/23/2016	MS	0.4	drafting Ps response to Joint Notice and circulating
3/23/2016	MS	0.2	ms/dg discuss discovery that Kellogg has not produced and its relevance for 30b6
3/23/2016	MS	0.4	tc w/ OC to negotiate depositions
3/23/2016	MS	0.3	redrafting Joint Notice of Non-Response and circulating
3/23/2016	JF	0.3	MR/JF Download Defendant's production sent to us from Greenberg Traurig 0.3
3/23/2016	MS	0.3	research depo dates for pre and post amendments
3/24/2016	MS	0.2	ms/jp discuss developing list of people outside FLSA SOL with state class claims
3/24/2016	MD	0.4	walk from depositions to hotel 0.4
3/24/2016	JF	0.6	Prepare list of non-respondents for attorneys to consider if we can bring claims under specific state laws 0.6
3/24/2016	JP	0.2	ms/jp discuss developing list of people outside FLSA SOL with state class claims
3/24/2016	MS	0.2	email exchange w/ jp re non-responder list

Date	Staff	Amount of Time	Description
3/24/2016	MS	0.2	email to mr re developing list of people outside FLSA SOL with state class claims
3/24/2016	MD	3	prepare client for deposition 3.0
3/24/2016	DG	0.1	review chgs to statement re dismissal of non-participating opt-ins .1
3/24/2016	JF	0.7	JP/JF Meet to discuss updates regarding the case 0.7
3/24/2016	JP	0.7	JP/JF Meet to discuss updates regarding the case 0.7
3/24/2016	JF	3.8	Compile research for 30b6 deposition outline via DT Search 3.8
3/24/2016	JF	1.7	Compile research for 30b6 deposition outline 1.7
			Transfer documents recd from ECF system to docket file and create file copy (Docket#352 - APPLICATION OF ATTORNEY Michael J.D. Sweeney FOR LEAVE TO APPEAR PRO HAC VICE for Plaintiffs Judy Brashear, Jennifer Dowling, Kelley Dye, Jr, Robert Gibson, Bruce Johnson, David Mastenbrook, Armond McWell, David Rink, Soliman Sayedi, Patty Thomas, Laura Wisby (Fee Paid) Receipt No. 0981-4387811 (Subit, Michael)
3/24/2016	CLER	0.1	Thomas, Laura Wisby (Fee Paid) Receipt No. 0981-4387811 (Subit, Michael)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#353 - ORDER on the [352] Application for Leave to Appear Pro Hac Vice. The Court ADMITS Attorney Michael J.D. Sweeney for plaintiffs, by Clerk William M McCool. (No document associated with this docket entry, text only.)
3/24/2016	CLER	0.1	associated with this docket entry, text only.)
3/24/2016	KW	3.5	complete deposition digest of named palintiffs deposition 3.5
3/24/2016	MS	0.1	email to OC re filing Joint Notice
3/24/2016	MD	8.5	defend deposition 8.5 (client running late thus waiting for client to appear)
3/24/2016	MS	0.4	finalizing Statement Related to Joint Statement for filing
3/24/2016	MD	0.4	walk to deposition from hotel 0.4
3/24/2016	KW	2.5	wrok on Deposition Digest of named plaintiff
3/25/2016	MD	6	defend opt-in deposition 6.0
			Transfer documents recd from ECF system to docket file and create file copy (Docket#355 - STATEMENT of Plaintiffs re [354] Notice-Other, of Joint Notice of Non-Response Pursuant to Court's Order Dated January 20, 2016 by Plaintiff Patty Thomas (Getman, Dan)
3/25/2016	CLER	0.1	Dan)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#354 - NOTICE Joint Notice of Non-Response Pursuant to Court's Order Dated January 20, 2016 ; filed by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1) Exhibit A to Joint Notice of Non-Response, # (2) Exhibit B to Joint Notice of Non-Response)(Nelson, James)
3/25/2016	CLER	0.1	Response)(Nelson, James)
3/25/2016	MD	0.7	discuss deposition and next steps in case with client post deposition 0.7
			ECF Filing of P. STATEMENT re [354] Notice-Other, of Joint Notice of Non-Response
3/25/2016	AG	0.1	Pursuant to Court's Order Dated January 20, 2016
3/25/2016	MR	0.5	create list of excluded non-responders with unique identifiers and states
3/25/2016	MD	10.5	travel from Dallas opt-in deposition 10.5
3/25/2016	JP	2.5	review and organize defendants document production
3/25/2016	CLER	0.1	create PDF format of correspondence recd from D. ( response to P. 3.16.16 ltr)
3/25/2016	MD	0.7	meet with client before deposition and discuss case 0.7
3/27/2016	MR	1.8	create initial test formats to gauge claims for non-responders
			MS/MD/MR/JP/JF/ME review upcoming deadlines .3; disucss status of discovery of plaintiffs .3; discuss status of discovery of Kellogg .5; review retaliation concerns .2;
3/28/2016	MS	1.4	review pending and upcoming motions .1
			MS/MD/MR/JP/JF/ME review upcoming deadlines .3; disucss status of discovery of plaintiffs .3; discuss status of discovery of Kellogg .5; review retaliation concerns .2;
3/28/2016	MR	1.4	review pending and upcoming motions .1

Date	Staff	Amount of Time	Description
3/28/2016	MD	1.4	MS/MD/MR/JP/JF/ME review upcoming deadlines .3; discuss status of discovery of plaintiffs .3; discuss status of discovery of Kellogg .5; review retaliation concerns .2; review pending and upcoming motions .1
3/28/2016	JP	1.4	MS/MD/MR/JP/JF/ME review upcoming deadlines .3; discuss status of discovery of plaintiffs .3; discuss status of discovery of Kellogg .5; review retaliation concerns .2; review pending and upcoming motions .1
3/28/2016	JF	1.4	MS/MD/MR/JP/JF/ME review upcoming deadlines .3; discuss status of discovery of plaintiffs .3; discuss status of discovery of Kellogg .5; review retaliation concerns .2; review pending and upcoming motions .1
3/28/2016	ME	0.3	JP/ME review emails produced by defense counsel
3/28/2016	MR	0.5	compose and send email to team about privilege log issues
3/28/2016	JP	0.3	JP/ME review emails produced by defense counsel
3/28/2016	MR	0.2	send email to team with document about internal time study 2013
3/28/2016	JF	3.8	Compile research for 30b6 deposition outline via DT Search 3.8
3/28/2016	JF	0.2	Split a document to create an exhibit to be used for 30b6 deposition 0.2
3/28/2016	JF	0.2	Compose email for attorneys to review in preparation for 30b6 deposition 0.2
3/28/2016	MR	0.1	reply to email from ME about email load file addendum
3/28/2016	ME	1.4	MS/MD/MR/JP/JF/ME review upcoming deadlines .3; discuss status of discovery of plaintiffs .3; discuss status of discovery of Kellogg .5; review retaliation concerns .2; review pending and upcoming motions .1
3/28/2016	MR	0.5	MR/ME review metadata file for management emails produced by defense counsel
3/28/2016	MR	0.1	send follow-up email to team about using OCR to make hidden powerpoint files searchable
3/28/2016	MR	0.3	compose and send email to team about Defendant email production defects
3/28/2016	MS	4.3	review dos for incorporation and use in 30(b)(6)
3/28/2016	MS	0.2	MS/ME review location of documents to be used for 30b6 deposition
3/28/2016	MR	0.1	send email to MD about table linking Territory number to RSR/TM per Dombkowicz dep
3/28/2016	ME	0.4	review/compile documents for 30b6 deposition
3/28/2016	MS	0.6	ms/md/jp/mr discuss use and discovery of phone records
3/28/2016	JF	0.4	MR/JF investigate ways to perform DT Search of management emails more efficiently 0.4
3/28/2016	MR	0.1	send email to team about Clifton 30b6 about corporate sales agreements
3/28/2016	MS	0.8	review and revise 30(b)(6) notice
3/28/2016	JP	2.1	review and organize K's document production
3/28/2016	MR	2.5	review and prepare relevant extracts of Kellogg ESI depo testimony
3/28/2016	ME	0.5	MR/ME review metadata file for management emails produced by defense counsel
3/28/2016	MS	1.1	developing doc list for 30b6 depo
3/28/2016	ME	0.2	download and save documents produced by defense counsel
3/28/2016	ME	0.1	telephone call from opt-in regarding case update
3/28/2016	MR	0.4	MR/JF investigate ways to perform DT Search of management emails more efficiently 0.4
3/28/2016	MD	0.6	ms/md/jp/mr discuss use and discovery of phone records
3/28/2016	MR	0.6	ms/md/jp/mr discuss use and discovery of phone records
3/28/2016	JP	0.6	ms/md/jp/mr discuss use and discovery of phone records
3/28/2016	ME	0.5	review video discovery requests to determine which videos remains outstanding .3; compile list of videos that were produced by defendants .2
3/28/2016	MR	0.1	send email to JP and ME with questions about stray production files

Date	Staff	Amount of Time	Description
3/28/2016	JF	0.1	Compose email regarding Bates stamped folder organization to be sent to colleagues 0.1
3/28/2016	ME	0.2	scan opt-in's discovery documents
3/28/2016	ME	0.2	MS/ME review location of documents to be used for 30b6 deposition
3/28/2016	MR	0.1	send email to team about Boudreau agreeing to supply us with management suite user id format
3/29/2016	ME	0.1	MA/ME review adding index to DT search so that additional emails produced by defense counsel can be searched
3/29/2016	JP	1	JP/MR discuss and review various production file issues 1.0
3/29/2016	MR	3	examine document production folder contents .2, review and save various documents from email production 2.8
3/29/2016	MA	0.1	MA/ME review adding index to DT search so that additional emails produced by defense counsel can be searched
3/29/2016	ME	0.2	ME/JF discuss research findings in order to compile docs to be used for 30b6 deposition 0.2
3/29/2016	ME	0.2	locate tracking sheet of separation agreements received for each opt-in to email to MR
3/29/2016	ME	0.1	locate and email MS link to opt-in's document to be used for 30b6 deposition
3/29/2016	ME	0.1	Kellogg ME/MR phone call about severance analysis .1
3/29/2016	MR	0.1	Kellogg ME/MR phone call about severance analysis .1
3/29/2016	MR	0.1	read and reply to JP email about John Bryant docs
3/29/2016	JP	0.6	JP/JF review outline format for 30b6 to determine best way to review and document needed data
3/29/2016	ME	0.5	JP/ME review location of defendant's discovery documents
3/29/2016	CLER	0.3	organize documents in plaintiff discovery folders
3/29/2016	MD	0.2	MD/ME review outstanding discovery
3/29/2016	MS	0.4	review jf annotations to 30b6 outline
3/29/2016	ME	0.2	MD/ME review outstanding discovery
3/29/2016	MD	0.2	md/ms discuss edits to 30(b)(6) notice 0.2
3/29/2016	MS	0.3	review privilege log and email to md re missing info
3/29/2016	JP	1	MR/JP discuss production problems thru history of Kellogg's production to determine if we need different versions and how to review all docs
3/29/2016	ME	0.1	download/file discovery documents produced by defense counsel
3/29/2016	MS	0.2	md/ms discuss edits to 30(b)(6) notice 0.2
3/29/2016	MR	0.1	Kellogg JF/MR phone call about severance analysis .1
3/29/2016	JP	1.8	review documents produced by clients to determine if Kellogg has produced requested documents
3/29/2016	JF	0.2	Implement corrections to outline (per MS) 0.2
3/29/2016	JF	0.1	Kellogg JF/MR phone call about severance analysis .1
3/29/2016	MR	1	MR/JP discuss production problems thru history of Kellogg's production to determine if we need different versions and how to review all docs
3/29/2016	JF	1.6	Compile research for 30b6 deposition outline via DT Search 1.6
3/29/2016	JF	0.2	ms/jf tc re annotations to 30b6 outline
3/29/2016	JF	3.8	Compile research for 30b6 deposition outline via DT Search 3.8
3/29/2016	MS	0.2	ms/jf tc re annotations to 30b6 outline
3/29/2016	MS	0.1	review md edits to 30b6 depo notice
3/29/2016	JP	0.5	JP/ME review location of defendant's discovery documents
3/29/2016	JF	0.6	JP/JF review outline format for 30b6 to determine best way to review and document needed data
3/29/2016	MS	0.2	review mr emails re missing ESI and ESI letter to OC

Date	Staff	Amount of Time	Description
3/29/2016	MR	0.7	examine Defendant privilege logs .5, examine MD list of outstanding discovery .2
3/29/2016	ME	0.5	review videos produced by defense counsel
3/29/2016	ME	0.1	verify defendant's discovery documents have been filed in correct folder
3/29/2016	ME	0.4	prepare opt-in's documents for production to defense counsel by reviewing, combining multiple pdf files, and bates stamping .3; send documents to defense counsel .1
3/29/2016	ME	2.4	review management emails produced by defense counsel to find documents needed for 30b6 deposition
3/29/2016	JP	0.7	review plaintiff information to find reference to CEO John Bryant video, then review produced documents to see if Kellogg produced this video.
3/29/2016	JF	0.2	ME/JF discuss research findings in order to compile docs to be used for 30b6 deposition
3/29/2016	JP	1.2	review Kellogg production files for documents re employee reviews specific to hours worked and job duties, found K did not produce, email data to MD
3/30/2016	ME	0.9	MD/MR/JP/JF/ME discuss how to prioritize document review for 30b6 deposition and summary judgement
3/30/2016	MR	0.2	MR/ME organize defendant's electronic discovery files on server
3/30/2016	JP	1.5	JP/JF/ME meet to determine best method for organizing documents for 30b6 deposition and summary judgement motion
3/30/2016	ME	0.3	review privilege logs produced by defendant
3/30/2016	JF	1.5	JP/JF/ME meet to determine best method for organizing documents for 30b6 deposition and summary judgement motion
3/30/2016	ME	0.2	MR/ME organize defendant's electronic discovery files on server
3/30/2016	JF	0.1	Compose email to JLP to notify her of 30b6 annotated outline formatting changes 0.1
3/30/2016	ME	1.5	JP/JF/ME meet to determine best method for organizing documents for 30b6 deposition and summary judgement motion
3/30/2016	JF	0.1	JF/MR - discuss some info from later meeting about production protocol
3/30/2016	JF	1.3	Format the 30b6 annotated outline 1.3
3/30/2016	MR	0.1	JF/MR - discuss some info from later meeting about production protocol
3/30/2016	MR	2.3	Kellogg - examine and copy older Def email PST production to fileserver 1.5, create dtsearch index on older Def email prod .3, perform various searches on PST indexes .5
3/30/2016	ME	0.9	review management emails produced by defense counsel for documents to be used for 30b6 deposition and summary judgement
3/30/2016	ME	0.1	ME/MR - phone call about sending notice of new production to entire team
3/30/2016	MR	0.1	ME/MR - phone call about sending notice of new production to entire team
3/30/2016	MR	0.1	read and reply to email from ME about privilege logs
3/30/2016	MD	0.9	MD/MR/JP/JF/ME discuss how to prioritize document review for 30b6 deposition and summary judgement
3/30/2016	MR	1.1	research and test jpg/tif to pdf converter
3/30/2016	MR	0.9	MD/MR/JP/JF/ME discuss how to prioritize document review for 30b6 deposition and summary judgement
3/30/2016	JP	0.9	MD/MR/JP/JF/ME discuss how to prioritize document review for 30b6 deposition and summary judgement
3/30/2016	JF	0.9	MD/MR/JP/JF/ME discuss how to prioritize document review for 30b6 deposition and summary judgement
3/30/2016	ME	3	update defendant production tracking spreadsheet

Date	Staff	Amount of Time	Description
			double check defendant production tracking spreadsheet for any gaps in bates
3/31/2016	ME	0.5	numbers/documents to verify all have been received and saved
3/31/2016	MR	0.2	MR/ME discuss issue with index for emails produced by defense counsel
3/31/2016	KW	4.2	Complete deposition digest 4.2
3/31/2016	ME	0.2	telephone call with opt-in regarding question about discovery and case update
			JP/MR/JF/ME determine best organization plan for filing electronic discovery documents
3/31/2016	ME	1.1	to use for 30b6 deposition and summary judgement
3/31/2016	JF	1.4	Compile research for 30b6 deposition outline via DT Search 1.4
3/31/2016	MS	0.5	review and analyze Kellogg motion for protective order
			MD/MR/JP/JF/ME develop plan for researching and organizing documents for 30b6
3/31/2016	ME	1.2	deposition and summary judgement
			Prepare for meeting re case documents organization in anticipation of 30b6
3/31/2016	JF	0.7	deposition/summary judgment 0.7
			MD/MR/JP/JF/ME develop plan for researching and organizing documents for 30b6
3/31/2016	JP	1.2	deposition and summary judgement
			MD/MR/JP/JF/ME develop plan for researching and organizing documents for 30b6
3/31/2016	MR	1.2	deposition and summary judgement
			MD/MR/JP/JF/ME develop plan for researching and organizing documents for 30b6
3/31/2016	MD	1.2	deposition and summary judgement
			JP/MR/JF/ME determine best organization plan for filing electronic discovery documents
3/31/2016	JP	1.1	to use for 30b6 deposition and summary judgement
			JP/MR/JF/ME determine best organization plan for filing electronic discovery documents
3/31/2016	MR	1.1	to use for 30b6 deposition and summary judgement
			MD/MR/JP/JF/ME develop plan for researching and organizing documents for 30b6
3/31/2016	JF	1.2	deposition and summary judgement
			JP/MR/JF/ME determine best organization plan for filing electronic discovery documents
3/31/2016	JF	1.1	to use for 30b6 deposition and summary judgement
3/31/2016	ME	0.1	email deposition transcript to opt-in for review
			JP/JF/ME create filing naming system for documents to be used for 30b6 and summary
3/31/2016	ME	0.8	judgement
3/31/2016	ME	0.1	file opt-in's electronic deposition transcript
			JP/JF/ME create filing naming system for documents to be used for 30b6 and summary
3/31/2016	JP	0.8	judgement
			search opt-in emails produced by defense counsel for possible exhibits to use for 30b6
3/31/2016	ME	1.1	deposition and summary judgement
			JP/JF/ME create filing naming system for documents to be used for 30b6 and summary
3/31/2016	JF	0.8	judgement
3/31/2016	ME	0.2	MR/ME discuss issue with index for emails produced by defense counsel
4/1/2016	MR	0.3	md/mr discuss information contained in joint business plan documents 0.3
4/1/2016	MD	0.3	md/mr discuss information contained in joint business plan documents 0.3
4/1/2016	MD	0.5	call with defense counsel about outstanding discovery issues 0.5
4/1/2016	MD	0.1	email defense counsel in response to letter 0.1
4/1/2016	MD	0.2	read letter from defense counsel re discovery 0.2
4/1/2016	JF	0.6	Perform DT Search given specific search terms (per MD) 0.6
4/1/2016	MD	0.1	review documents referenced by defense counsel 0.1
4/1/2016	MD	0.7	reviewing joint business plan documents 0.7
4/1/2016	JF	5.4	Compile research for 30b6 deposition outline via DT Search 5.4
			determine reason for missing bates ranges in the tracking of defendant production of
4/1/2016	ME	1	documents
4/1/2016	JP	3.5	review plt doc production for use in 30b6 and summary judgement



Date	Staff	Amount of Time	Description
4/1/2016	ME	3.5	review training videos produced by defendants and make notations for attorneys to reference when preparing for 30b6 deposition and summary judgement
4/1/2016	ME	0.5	search defendant production for documents to use for 30b6 deposition and summary judgement
4/1/2016	JF	1.1	Perform DT Search given specific search terms (per JP) 1.1
4/4/2016	MR	0.1	MR/JF Update on the organization of management emails 0.1
4/4/2016	JF	0.4	Re-organize management email research to put in folder 20 (Proof Chart) 0.4
4/4/2016	ME	0.1	MD/ME discuss opt-in discovery
4/4/2016	MD	0.1	email defense counsel re issues to discuss for discovery 0.1
4/4/2016	ME	0.2	JF/ME clarify process for indicating documents to be used for 30b6 deposition
4/4/2016	MD	0.1	MD/ME discuss opt-in discovery
4/4/2016	MS	0.1	MS/ME clarify process for indicating documents to be used for 30b6 deposition
4/4/2016	MD	0.5	prepare for call with defense counsel re discovery 0.5
4/4/2016	JF	0.2	JF/ME clarify process for indicating documents to be used for 30b6 deposition
4/4/2016	JF	1.1	MS/MR/MD/JP/JF/ME review method for compiling documents for 30b6 deposition, summary judgement, and trial
4/4/2016	MS	0.9	md/ms call with defense counsel re discovery issues .9
4/4/2016	JF	4.3	Compile research for 30b6 deposition outline via DT Search 4.3
4/4/2016	MD	0.9	md/ms call with defense counsel re discovery issues .9
4/4/2016	MS	0.3	md/ms discuss issues to address with defense counsel re discovery telephone call 0.3
4/4/2016	ME	0.8	review emails produced by defense counsel to locate documents for 30b6 deposition .5; save correct format of selected files from defendant's email production for attorneys to review .3
4/4/2016	CLER	0.1	create PDF format of documents recd from client (Separaton agreement)
4/4/2016	CM	0.2	call from client re concern re severance agreement (.2)
4/4/2016	MD	0.3	md/ms discuss issues to address with defense counsel re discovery telephone call 0.3
4/4/2016	CLER	0.1	create PDF format of correspondence recd from D. (discovery topics)
4/4/2016	ME	0.1	MD/ME discuss impacts of severance agreements to opt-in's claims
4/4/2016	ME	1.1	MS/MR/MD/JP/JF/ME review method for compiling documents for 30b6 deposition, summary judgement, and trial
4/4/2016	ME	0.1	file opt-in's deposition transcript
4/4/2016	ME	0.5	search defendant email production for documents to use in 30b6 deposition
4/4/2016	MD	0.1	MD/ME discuss impacts of severance agreements to opt-in's claims
4/4/2016	ME	0.1	email deposition transcript to opt-in for review
4/4/2016	ME	0.3	compile documents for opt-ins' deposition files
4/4/2016	ME	0.2	telephone call from opt-in regarding severance agreement
4/4/2016	MS	0.3	ms/mr discuss accessibility of plaintiff data for additional Kellogg demands
4/4/2016	JP	1.1	MS/MR/MD/JP/JF/ME review method for compiling documents for 30b6 deposition, summary judgement, and trial
4/4/2016	MR	1.1	MS/MR/MD/JP/JF/ME review method for compiling documents for 30b6 deposition, summary judgement, and trial
4/4/2016	MR	0.3	ms/mr discuss accessibility of plaintiff data for additional Kellogg demands
4/4/2016	MD	1.1	MS/MR/MD/JP/JF/ME review method for compiling documents for 30b6 deposition, summary judgement, and trial
4/4/2016	MS	1.1	MS/MR/MD/JP/JF/ME review method for compiling documents for 30b6 deposition, summary judgement, and trial

Date	Staff	Amount of Time	Description
4/4/2016	ME	0.2	download discovery documents produced by defense counsel .1; save documents to opt-ins' deposition files
4/4/2016	ME	0.1	email MR regarding updating opt-in discovery tracking spreadsheet with information needed to respond to defense counsel
4/4/2016	MD	0.3	md/ms discuss results of telephone call with defense counsel re discovery issues and discuss next steps 0.3
4/4/2016	MS	0.3	md/ms discuss results of telephone call with defense counsel re discovery issues and discuss next steps 0.3
4/4/2016	ME	0.3	MS/ME review task to compile information needed to respond to defendant's motion to compel opt-in resumes
4/4/2016	MS	0.4	review Kellogg position on discovery of trial plan
4/4/2016	ME	0.1	MS/ME clarify process for indicating documents to be used for 30b6 deposition
4/4/2016	AG	0.6	Conduct bankruptcy search ( all named plaintiffs)
4/4/2016	MS	0.3	MS/ME review task to compile information needed to respond to defendant's motion to compel opt-in resumes
4/4/2016	ME	0.5	continue to review defendant's video production to determine if information can be used for 30b6 deposition and/or summary judgement
4/4/2016	JF	0.1	MR/JF Update on the organization of management emails 0.1
4/4/2016	JF	0.1	Compose email to JP regarding specific search term results 0.1
4/4/2016	JF	0.2	Call from claimant regarding re-structuring changes at Kellogg 0.2
4/5/2016	MS	0.8	review Reed deposition and doc production to respond to Kellogg refusal to acknowledge JBPs exists
4/5/2016	CLER	0.1	create PDF format of documents recd from client (Separation agreement)
4/5/2016	JF	0.4	ME/JF Meet to discuss defendant's production review assignments 0.4
4/5/2016	ME	0.1	MS/ME discuss location of deposition preparation information
4/5/2016	ME	0.1	JF/ME review process for updating deposition day sheet
4/5/2016	MS	0.6	research on Kellogg demand to produce resumes, including review of orders
4/5/2016	JF	0.1	JF/ME review process for updating deposition day sheet
4/5/2016	MS	0.1	MS/ME discuss location of deposition preparation information
4/5/2016	MS	0.2	research on Kellogg demand to produce Linked in accounts
4/5/2016	JF	0.4	Schedule depo prep meetings for claimants in MN 0.4
4/5/2016	MS	0.7	research on Kellogg demand to produce trial plan
4/5/2016	JF	0.5	MD/JF/ME review information needed to respond to opt-ins with concerns about how their severance agreement impacts their involvement in the case or vice versa
4/5/2016	MD	0.5	MD/JF/ME review information needed to respond to opt-ins with concerns about how their severance agreement impacts their involvement in the case or vice versa
4/5/2016	ME	0.1	email JP and JF about paralegal tasks to prepare for 30b6 deposition
4/5/2016	AN	0.1	Exchange email with opt-in regarding contact information
4/5/2016	JF	0.3	ME/JF Discuss 1. the severance pay script to effectively field phone calls 0.2 2. deposition schedule 0.1
4/5/2016	ME	0.5	MD/JF/ME review information needed to respond to opt-ins with concerns about how their severance agreement impacts their involvement in the case or vice versa
4/5/2016	ME	0.1	email MS about opt-in discovery
4/5/2016	ME	0.3	ME/JF Discuss 1. the severance pay script to effectively field phone calls 0.2 2. deposition schedule 0.1
4/5/2016	ME	1.4	save correct format of defendant's email production to be reviewed for potential use for 30b6 deposition

Date	Staff	Amount of Time	Description
4/5/2016	MS	0.4	review contract section of doc production
4/5/2016	ME	0.2	MR/ME discuss opt-in discovery issues
4/5/2016	MS	0.1	review email on estimating hours circulated by ME
4/5/2016	ME	0.1	email JP about client question
4/5/2016	ME	0.3	telephone call from opt-in regarding question about severance and claims .2; notes from conversation .1
4/5/2016	JF	0.2	Call from opt-in regarding severance pay 0.2
4/5/2016	ME	0.6	search emails produced by defense counsel for 30b6 deposition preparation
4/5/2016	MD	0.3	ms/md review and assign 30b6 topics for outline development
4/5/2016	JF	4.8	Compile research for 30b6 deposition outline via DT Search 4.8
4/5/2016	MS	0.3	ms/md review and assign 30b6 topics for outline development
4/5/2016	ME	0.2	telephone call from opt-in regarding case update .1; notes from conversation .1
4/5/2016	ME	0.1	email MR about opt-in discovery tracking
4/5/2016	ME	0.1	tc from opt-in regarding question about severance impacts on claims
4/5/2016	MR	0.2	MR/ME discuss opt-in discovery issues
4/5/2016	ME	0.1	left voicemail for opt-in
4/5/2016	MS	1	draft letter to OC re Plaintiffs' positions on Kellogg demands
4/5/2016	ME	0.9	compile documents for attorney to review for 30b6 deposition
4/5/2016	ME	0.1	left voicemail for opt-in to follow up about opt-in's severance concerns
4/5/2016	MS	0.3	research into viability of determining bankruptcy status of opt-ins
4/5/2016	ME	0.4	ME/JF Meet to discuss defendant's production review assignments 0.4
4/5/2016	ME	0.1	telephone to opt-in to follow up about severance agreement questions
4/5/2016	MS	0.4	draft and circulate memo on meet and confer agreements
4/5/2016	ME	0.2	telephone call from opt-in about severance agreement concerns
4/5/2016	ME	0.2	telephone call from opt-in regarding question about severance agreement
4/6/2016	ME	0.3	MS/ME review opt-in's severance agreement to determine plan for responding to client concerns about impact to their claims
Transfer documents recd from ECF system to docket file and create file copy (Docket#356 - ORDER re [347] MOTION for Reconsideration of Order Compelling Production of Willard Bishop Study by Judge Ronald B. Leighton. The Court is inclined to grant in camera review and invites the Plaintiffs to respond to the motion within 10 days. Reply is due by 4/15/2016. Motion [347] renoted to 4/15. (JAB)			
4/6/2016	CLER	0.1	4/15/2016. Motion [347] renoted to 4/15. (JAB)
4/6/2016	JP	0.1	email update and respond to client's request for info on settlement date
4/6/2016	JP	0.3	review severance documents emailed by client
4/6/2016	MS	0.3	MS/ME review opt-in's severance agreement to determine plan for responding to client concerns about impact to their claims
4/6/2016	MS	0.2	email to MR re evidence regarding Kellogg allegations re ESI depositions
4/6/2016	ME	0.3	MS/JP/ME discuss client concerns about severance agreement's impact to claims
4/6/2016	MS	0.3	MS/JP/ME discuss client concerns about severance agreement's impact to claims
4/6/2016	MS	0.2	follow up on potential witness for decision making info
4/6/2016	JP	0.3	arrange interview time with MS, JP and witness to discuss her knowledge of RSRs and sales in Kellogg
4/6/2016	JP	0.5	JP/ME discuss speaking to clients about their concerns about the impact of signing a severance agreement on their overtime claims
4/6/2016	ME	0.5	JP/ME discuss speaking to clients about their concerns about the impact of signing a severance agreement on their overtime claims
4/6/2016	MS	0.2	respond to jp email re para work on Kellogg

Date	Staff	Amount of Time	Description
4/6/2016	MS	0.1	respond to ME email re docs on timekeeping
4/6/2016	JP	0.3	em to attorneys in the case to request additional help in prioritizing document review and methods.
4/6/2016	MS	0.2	draft acceptable language for release
4/6/2016	MS	0.3	review and compare Kellogg releases for severance pay
4/6/2016	JP	0.4	JP/ME review procedure for compiling 30b6, summary judgement, and trial documents .2; review tasks to complete for compiling documents .2
4/6/2016	ME	2.3	search defendant's production for documents to use for 30b6 deposition, summary judgement, and trial
4/6/2016	JP	0.6	Discuss severance language and his request to opt out in order to not risk his severance
4/6/2016	MS	0.2	email to dg/md re approach to Kellogg release
4/6/2016	MS	0.5	review Kellogg motion for protective order
4/6/2016	JP	0.3	MS/JP/ME discuss client concerns about severance agreement's impact to claims
4/6/2016	ME	0.4	JP/ME review procedure for compiling 30b6, summary judgement, and trial documents .2; review tasks to complete for compiling documents .2
4/6/2016	ME	0.3	compile hard copy of defendant deposition transcripts for MD to review
4/6/2016	MS	0.7	draft outline of issues to address in response to motion for protective order
4/6/2016	JF	2.1	Compile research for 30b6 deposition outline via DT Search 2.1
4/6/2016	JP	0.5	Discussed severance agreement and his concern about having to drop out of the lawsuit
4/6/2016	JF	0.2	Attempt to reach opt-in regarding deposition preparation and deposition details 0.2
4/6/2016	JF	0.3	Attempt to contact opt-in regarding deposition preparation scheduling 0.3
4/7/2016	JP	0.2	em to paralegals on case re definition of churn and importance in K case
4/7/2016	CLER	0.1	create PDF format of documents recd from D. ( D. disclosure of expert testimony on class certification and merit issues)
4/7/2016	MS	0.9	legal research into permissibility of release is severance agreement
4/7/2016	JP	0.1	sent em case update at plts request
4/7/2016	ME	0.3	telephone call from opt-in about discovery and case update
4/7/2016	ME	2.9	review documents compiled for 30b6 deposition to become familiar with documents and note any keywords for future searches
4/7/2016	JP	0.6	summarized retaliation concerns of plaintiffs and all the data gathered to date to determine if K retaliated against plts for being part of the case
4/7/2016	ME	0.1	email opt-in link to case updates
4/7/2016	AN	0.1	Telephone call regarding Kellogg restructuring
4/7/2016	JF	0.1	Respond to MD's email request to send him the Defendant's recently filed Protective Order 0.1
4/7/2016	MS	1.5	interview with former worker re details of RSR program
4/7/2016	MS	0.5	drafting outline for interview w/ former worker re details of RSR program
4/7/2016	JP	1.5	interview with former worker re details of RSR program
4/7/2016	MS	0.8	drafting outline of opposition to Kellogg M for PO
4/7/2016	ME	0.7	review files for 30b6 deposition to determine where they should be filed based on category .5; update index to include documents and notations about documents .2
4/7/2016	JF	0.5	Select relevant documents found in the Kellogg MGMT email production to file in the "please review" folder 0.5
4/7/2016	JP	0.2	JP/JF Discuss the most effective ways to manage attorney overviews of specific documents in Kellogg production (MGMT emails) 0.2

Date	Staff	Amount of Time	Description
4/7/2016	JF	0.1	Respond to MD's email request to send him the Third Amended Complaint 0.1
4/7/2016	ME	0.7	search defendant's production for documents needed for 30b6 deposition, summary judgement, and trial
4/7/2016	JP	0.2	JP/ME determine where index of important documents should be located
4/7/2016	ME	0.1	reply to opt-in's email about discovery
4/7/2016	ME	0.2	JP/ME determine where index of important documents should be located
4/7/2016	JP	2.5	review documents for 30b6 and summary judgement
4/7/2016	MS	0.1	email w/ jp re call with potential witness
4/7/2016	ME	0.1	send MS information about opt-in with severance questions
4/7/2016	CLER	0.3	download defendant production .1; file documents and notify team about location .1;
4/7/2016	ME	0.2	track production
4/7/2016	ME	0.2	telephone call from opt-in regarding severance question
4/7/2016	JF	5.1	Compile research for 30b6 deposition outline via DT Search 5.1
4/7/2016	JF	0.2	JP/JF Discuss the most effective ways to manage attorney overviews of specific documents in Kellogg production (MGMT emails) 0.2
4/8/2016	JP	0.5	JP/JF reviewed management emails for use in 30b6 and summary judgement
4/8/2016	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy (Docket#357 - MOTION for Protective Order by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Exhibit A, # (2) Exhibit B, # (3) Exhibit C, # (4) Exhibit D, # (5) Exhibit E, # (6) Exhibit F, # (7) Exhibit G, # (8) Exhibit H, # (9) Exhibit I, # (10) Exhibit J, # (11) Exhibit K, # (12) Proposed Order Granting Kellogg Company and Kellogg Sales Company's First Motion for Protective Order) Noting Date 4/15/2016, (Nelson, James)
4/8/2016	JP	0.5	Review witness interview notes from MS and add additional related information to help clarify K's sales process
4/8/2016	MS	0.7	draft outline for opposition to M for PO
4/8/2016	JF	0.5	JP/JF reviewed management emails for use in 30b6 and summary judgement
4/8/2016	JF	0.3	Read the latest defendant's response related to Joint Notice of Non-Reponse 0.3
4/8/2016	JP	0.8	client called for update and helped explicate gap plans and cross docs and other means of forcing in product
4/8/2016	JP	0.2	em attorneys the paralegal work assignments issues for next week
4/8/2016	MS	0.2	tc w/ opt-in re conflict between severance and claims in the case
4/8/2016	MS	0.5	review and revise depo digest outline
4/8/2016	JP	1.8	review documents for 30b6 and summary judgement
4/8/2016	JF	2.3	Compile research for 30b6 deposition outline via DT Search 2.3
4/8/2016	MS	0.2	ms/dg discuss approach to Kellogg's failure to produce initial expert reports
4/8/2016	JF	2.1	Compile research for 30b6 deposition outline via DT Search 2.1
4/8/2016	MS	0.4	review Kellogg expert disclosures and circulate email to team
4/8/2016	KIM	0.3	ms/kw meet to discuss legal research for opposition to M for PO
4/8/2016	MS	0.3	ms/kw meet to discuss legal research for opposition to M for PO
4/8/2016	MS	0.1	review scheduling order for expert witness report due dates
4/8/2016	DG	0.2	ms/dg discuss approach to Kellogg's failure to produce initial expert reports
4/8/2016	JF	0.2	Compose email to JLP to inquire about relevance of a specific document related to Kellogg production 0.2
4/8/2016	MS	0.1	circulate proof outline to jp
4/8/2016	JP	0.2	MS/JP discuss follow up tasks from the information gained in the witness interview
4/8/2016	KIM	0.8	Meet w MS (0.2 x 2) and research (.4) RE 30(b)(6) protective order from respondent.

Date	Staff	Amount of Time	Description
4/8/2016	MS	0.2	MS/JP discuss follow up tasks from the information gained in the witness interview
4/11/2016	ME	0.2	read defendants' response to plaintiffs' statement related to joint notice of non-response
4/11/2016	MS	1.8	legal research on allowing two-days of testimony for 30b6 depositions
4/11/2016	JP	0.2	MS/JP/ME discuss information needed for response to defendant's motion for protective order re 30b6 deposition
4/11/2016	MS	0.2	MS/JP/ME discuss information needed for response to defendant's motion for protective order re 30b6 deposition
4/11/2016	ME	0.2	MS/JP/ME discuss information needed for response to defendant's motion for protective order re 30b6 deposition
4/11/2016	JP	2.1	JP/ME compile information for response to defendant's motion for protective order re 30b6 deposition
4/11/2016	KIM	1.9	Compile research on 30(b)(6) particularity for response to motion for prot. order.
4/11/2016	JP	0.2	organize tasks priorities for para work this week & send to team
4/11/2016	ME	0.2	MS/ME review information about defendants' discovery production needed for response to defendants' motion for protective order
4/11/2016	ME	0.3	read defendants' motion for protective order
4/11/2016	KIM	0.8	Westlaw research on 30(b)(6) particularity for response to mot. protective order.
4/11/2016	MS	0.2	MS/ME review information about defendants' discovery production needed for response to defendants' motion for protective order
4/11/2016	DG	0.7	read def protective order brf .4; call w MS re motion for protective order .1; research re same .2
4/11/2016	ME	2.1	JP/ME compile information for response to defendant's motion for protective order re 30b6 deposition
4/11/2016	MS	0.1	call w MS re motion for protective order .1
4/11/2016	KIM	0.9	Read/compile research on 30(b)(6) particularity for response to mot. protective order.
4/11/2016	MS	0.2	MS/KW meet to discuss replying to respondent's mot seeking protective order.
4/11/2016	JP	2.5	compile information for response to K's motion to for a protective order re 30b6: 2.2; review docs found while compiling info; .3
4/11/2016	MD	0.2	MD/ME discuss management emails produced by defense counsel
4/11/2016	JP	0.9	Find and organize all documents and info from Plt or Def. re [client] for depo
4/11/2016	ME	0.2	MD/ME discuss management emails produced by defense counsel
4/11/2016	ME	1	use key terms to search defendants' discovery documents for possible 30b6 deposition exhibits
4/11/2016	ME	1	search documents produced by defense counsel for possible exhibits to use during 30b6 deposition
4/11/2016	CLER	0.5	file hard copies of opt-in documents
4/11/2016	CLER	0.1	create PDF format of consent to sue recd
4/11/2016	CLER	0.1	Data Entry of contact information
4/11/2016	KIM	0.5	Read Wright & Miller on 30(b)(6) for response to mot. protective order.
4/11/2016	KIM	0.2	MS/KW meet to discuss replying to respondent's mot seeking protective order.
4/11/2016	MD	0.8	md/ms discussing arguments to make in responding to Kellogg's motions and expert disclosures
4/11/2016	ME	0.1	reply to opt-in's email regarding case update
4/11/2016	ME	0.4	download discovery documents produced by defense counsel .1; file and track documents .3



Date	Staff	Amount of Time	Description
4/11/2016	MS	0.8	md/ms discussing arguments to make in responding to Kellogg's motions and expert disclosures 0.8
4/12/2016	JP	0.8	Review and organize depo history of Plt and Def for Opposition to Kellogg's Motion for Protective Order
4/12/2016	MS	1.8	legal research for section on right to post-discovery 30b6 after pre-cert depo
4/12/2016	JP	0.2	JP/ME review process for utilizing index to search defendants' email production
4/12/2016	ME	0.2	tc from opt-in regarding restructure
4/12/2016	ME	0.3	review deposition digest outline for opt-in depositions
4/12/2016	KIM	1.5	Westlaw research for opp mot for protective order
4/12/2016	MS	0.9	legal research on distinction between 30b6 depositions and fact depositions and order of discovery
4/12/2016	ME	0.6	begin to digest opt-in's deposition transcript for attorneys to review
4/12/2016	MS	1.4	legal research for section on character of 30b6 depo and counting hours and depositions for purposes of limiting
4/12/2016	CLER	0.5	file hard copies of opt-ins' documents
4/12/2016	MS	1.4	legal research for section on character of 30b6 depo and counting hours and depositions for purposes of limiting
4/12/2016	ME	2.7	compile documents found during keyword search for attorney review
4/12/2016	JP	2.1	Get statistics and data needed for the Opposition to Kellogg's Motion for Protective Order
4/12/2016	KIM	3.5	Westlaw research/compilation of cases for opp mot for protective order
4/12/2016	JP	4.1	review K emails and document production, 2.7 and research personnel structure for levels of sales employees, 1.4
4/12/2016	JS	0.3	identify word copies of memo iso PSJ and reply memo iso PSJ from similar case, eml to ET per Ms
4/12/2016	MR	0.2	MR/ME review utilizing pdf converter program to convert defendants' production to pdf for more efficient review
4/12/2016	ME	0.3	use keywords to search defendants' email production for possible 30b6 deposition exhibits
4/12/2016	ME	0.2	JP/ME review process for utilizing index to search defendants' email production
4/12/2016	MS	1.6	reviewing record for response to Kellogg MFPO
4/12/2016	ME	0.2	MR/ME review utilizing pdf converter program to convert defendants' production to pdf for more efficient review
4/13/2016	MS	1.7	drafting section explaining and detailing ESI depo discovery and explaining why it is not a substitute for post-discovery 30b6 depo testimony
4/13/2016	AG	0.5	review rules and procedures for filing exhibits under seal
4/13/2016	MS	0.9	drafting section explaining why two days should be scheduled for 30b6 depo testimony
4/13/2016	JK	0.6	JK/JP review scheduling excel spreadsheet with formulas to determine use in 30b6 and for proof of hours worked using K formulas
4/13/2016	ME	0.2	CM/ME review procedure for creating deposition digest
4/13/2016	JP	0.2	MS/JP review data re Def & Plt production summarized for use in Opposition to Kellogg's Motion for Protective Order
4/13/2016	JF	0.8	Locate MGMT emails regarding break/meal policies Kellogg implemented (for MD) 0.8
4/13/2016	CM	0.2	CM/ME review procedure for creating deposition digest
4/13/2016	MA	0.7	MA/ME mark citations in plaintiffs' opposition to defendants' motion for protective order

Date	Staff	Amount of Time	Description
4/13/2016	MS	0.7	research on Kellogg's privilege claims
4/13/2016	JP	0.6	JK/JP review scheduling excel spreadsheet with formulas to determine use in 30b6 and for proof of hours worked using K formulas
4/13/2016	KIM	1.3	Finish research for opp mot seeking protective order.
4/13/2016	ME	0.3	search defendants' discovery production for information requested by MD
4/13/2016	DG	2	edit brief in opposition to motion for protective order 1; legal research re cases involving 30b6 depositions greater than 1 day
4/13/2016	MS	0.7	research on Kellogg's privilege claims
4/13/2016	MS	1.1	drafting section on Fed R provisions for 30b6 depo testimony
4/13/2016	JF	0.2	Compose email to JLP to check on document relevance
4/13/2016	JP	0.2	JP/CM review models of deposition digests (.2)
4/13/2016	CM	0.2	JP/CM review models of deposition digests (.2)
4/13/2016	JF	0.2	JP/JF Update on the current status of the Kellogg production review
4/13/2016	JS	0.6	additional revisions and formatting changes to brief
4/13/2016	JS	1.1	format brief with CAL numbering
4/13/2016	CLER	0.1	PCF client (update email address)
4/13/2016	JF	2.9	Compile research for 30b6 deposition outline via DT Search
4/13/2016	MS	0.2	MS/JP review data re Def & Plt production summarized for use in Opposition to Kellogg's Motion for Protective Order
4/13/2016	JP	0.2	JP/JF Update on the current status of the Kellogg production review
4/13/2016	MS	1.9	drafting chart explaining the relevance of each 30(b)(6) topic
4/13/2016	ME	0.5	review opt-in's deposition transcript to create digest
4/13/2016	ME	0.9	prepare exhibits for opposition to defendants' motion for protective order
4/13/2016	JF	1.7	Compile research for 30b6 deposition outline via DT Search
4/13/2016	ME	0.7	MA/ME mark citations in plaintiffs' opposition to defendants' motion for protective order
4/13/2016	MA	2.3	formatting brief and creating table of contents and table of authorities for response to motion for protection
4/14/2016	ME	0.2	MD/ME review defendants' outstanding discovery production
4/14/2016	MS	0.6	legal research on standards for addressing privilege objections
4/14/2016	ME	0.2	redownload defendants' previous production to verify outstanding discovery
4/14/2016	MS	0.4	review draft of opposition to reconsideration motion
4/14/2016	MS	1.1	review record on Willard Bishop study discovery and testimony
4/14/2016	MS	1.3	MS/JP/MD (in part)/ME review purpose for completing deposition digests and how they are used .6; develop plan for completing plaintiff deposition digests .7
4/14/2016	JP	1.3	MS/JP/MD (in part)/ME review purpose for completing deposition digests and how they are used .6; develop plan for completing plaintiff deposition digests .7
4/14/2016	MD	0.3	MS/JP/MD (in part)/ME review purpose for completing deposition digests and how they are used .6; develop plan for completing plaintiff deposition digests .7
4/14/2016	MS	0.3	respond to paralegal questions re depo digesting
4/14/2016	ME	0.2	verify that outstanding discovery production was not produced by defense counsel
4/14/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#361 - SEALED DOCUMENT Exhibit 7 - Joint Business Plan by Plaintiff Patty Thomas re [360] MOTION to Seal, [359] Response to Motion,,, (Dunn, Matt)
4/14/2016	MS	0.4	email to md re new strategy for opposition to reconsideration

Date	Staff	Amount of Time	Description
4/14/2016	MS	0.4	review 9th cir law on striking expert testimony
4/14/2016	ME	0.8	prepare for completing plaintiff deposition digests by reading those already done by KW to ensure consistency
4/14/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#360 - MOTION to Seal by Plaintiff Patty Thomas. (Attachments: # (1) Declaration) Noting Date 4/22/2016, (Dunn, Matt)
4/14/2016	AG	0.1	ECF Filing of PROPOSED ORDER (Unsigned) re [360] MOTION to Seal
4/14/2016	MD	0.2	MD/ME review defendants' outstanding discovery production
4/14/2016	ME	1.3	MS/JP/MD (in part)/ME review purpose for completing deposition digests and how they are used .6; develop plan for completing plaintiff deposition digests .7
4/14/2016	MS	0.3	follow up w/ jp re depo digesting resources, priority and staff
4/14/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#362 - PROPOSED ORDER (Unsigned) re [360] MOTION to Seal (Dunn, Matt)
4/14/2016	KIM	0.5	Research mot strike expert witness
4/14/2016	JS	0.1	format proposed order
4/14/2016	DG	0.1	email discussion re in camera review of time study issue .1
4/14/2016	ME	2.4	work on deposition digest of named plaintiff
4/14/2016	KIM	2	Research mot strike expert witness
4/14/2016	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy (Docket#359 - RESPONSE, by Plaintiff Patty Thomas, to [357] MOTION for Protective Order . (Attachments: # (1) Exhibit Exhibit 1 - ESI Deposition, # (2) Exhibit Exhibit 2 - ESI Deposition, # (3) Exhibit Exhibit 3 - ESI Deposition, # (4) Exhibit Exhibit 4 - ESI Deposition, # (5) Exhibit Exhibit 5 - Email, # (6) Exhibit Exhibit 6 - Deposition Notice, # (7) Exhibit Exhibit 7 - Joint Business Plan (Filed Under Seal), # (8) Exhibit Exhibit 8 - Reed Deposition, # (9) Exhibit Exhibit 9 - Letter, # (10) Exhibit Exhibit 10 - Organizational Chart, # (11) Exhibit Exhibit 11 - Thomas Deposition, # (12) Exhibit Exhibit 12 - Deposition Notice, # (13) Exhibit Exhibit 13 - Crowell Deposition, # (14) Exhibit Exhibit 14 - Pennington Deposition, # (15) Exhibit Exhibit 15 - Outside Counsel Emails, # (16) Exhibit Exhibit 16 - Email)(Dunn, Matt)
4/14/2016	ME	0.3	organize discovery documents for 30b6 deposition
4/15/2016	CM	0.2	CM/ME attempt to resolve issue with deposition .ptx file viewer
4/15/2016	KIM	1.9	Additional research for motion to strike expert (0.9) compile research (1.0).
4/15/2016	MS	0.2	draft outline for former worker interview
4/15/2016	MD	0.2	ms/md discuss upcoming tasks and allocations
4/15/2016	ME	0.1	listen to voicemail from opt-in
4/15/2016	MS	0.2	ms/md discuss upcoming tasks and allocations
4/15/2016	ME	0.2	CM/ME attempt to resolve issue with deposition .ptx file viewer
4/15/2016	DG	0.2	ms/dg discuss strategy for showing class certification on liability and damage trial plan
4/15/2016	DG	0.2	ms/dg discuss recent Kellogg motions and overall strategy
4/15/2016	MS	0.2	ms/dg discuss recent Kellogg motions and overall strategy
4/15/2016	MS	1.6	interview w/ former worker
4/15/2016	ME	0.3	review local rules for the court
4/15/2016	KIM	1.5	Additional research for motion to strike expert
4/15/2016	ME	0.3	search defendants' production for document requested by MD
4/15/2016	ME	0.1	MS/ME review deposition digest outline
4/15/2016	MS	0.1	MS/ME review deposition digest outline

Date	Staff	Amount of Time	Description
4/15/2016	MS	1.3	review and revise memo in opposition to reconsideration
4/15/2016	ME	0.3	read interview notes from conversation with witness
4/15/2016	JS	0.4	format brief
4/15/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#363 - MOTION to Compel Responses to Interrogatories by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Exhibit A, # (2) Exhibit B, # (3) Exhibit C, # (4) Exhibit D, # (5) Proposed Order) Noting Date 4/29/2016, (Nelson, James)
4/15/2016	ME	0.3	attempt to reach named plaintiffs to determine date for deposition
4/15/2016	ME	0.3	search defendants' discovery production for document requested by MD
4/15/2016	KIM	1.2	Read W.D. Wa cases granting Motion to Strike for failure to conform to Scheduling Order.
4/15/2016	ME	0.3	compile information needed for response to defendants' motion to reconsider
4/15/2016	ME	1	work on deposition digest for named plaintiff
4/15/2016	ME	0.5	prepare exhibits for response to defendant's motion for reconsideration
4/15/2016	MS	0.2	dg/ms discuss Boudreaus's most recent motion to compel .2
4/15/2016	ME	1.4	complete deposition digest for named plaintiff
4/15/2016	MS	0.2	ms/dg discuss strategy for showing class certification on liability and damage trial plan
4/15/2016	MD	0.1	MD/ME discuss document needed for motion
4/15/2016	ME	0.2	compile documents needed for motion
4/15/2016	ME	0.1	MD/ME discuss document needed for motion
4/15/2016	DG	0.2	dg/ms discuss Boudreaus's most recent motion to compel .2
4/15/2016	ME	1	work on deposition digest for named plaintiff
4/15/2016	ME	0.2	telephone call from plaintiff to determine availability for deposition
4/15/2016	MS	1.3	drafting new argument for opposition to reconsideration
4/16/2016	MD	6	reviewing documents for 30b6 deposition 6.0
4/18/2016	AG	0.5	Arrange Court Reporters (30b(6) depositions)
4/18/2016	CLER	0.6	file hard copies of opt-ins' discovery documents
4/18/2016	ME	2.1	work on deposition digest for named plaintiff
4/18/2016	JF	2.1	Review the Jim Hughes conversation document in order to navigate Kellogg production more effectively 2.1
4/18/2016	ME	0.1	telephone call to plaintiff to determine availability for deposition
4/18/2016	ME	0.2	download and save defendants' discovery production .1; track production .1
4/18/2016	KIM	0.4	MS KW meet to discuss research memo needed to cover production of trial plans in 9th Circuit.
4/18/2016	MD	8	travel to chicago for deposition 8.0
4/18/2016	KIM	1.7	Westlaw research on portion of Motion to Compel about trial plans
4/18/2016	JF	0.8	Review the most recent brief filings/motions 0.8
4/18/2016	DG	0.1	review email from client re change of job responsibilities .1
4/18/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#364 - RESPONSE, by Plaintiff Patty Thomas, to [347] MOTION for Reconsideration of Order Compelling Production of Willard Bishop Study. (Attachments: # (1) Exhibit Exhibit 1 - Email re Industrial Engineer, # (2) Exhibit Exhibit 2 - Except from Kellogg Privilege Log, # (3) Exhibit Exhibit 3 - Email re Job Title)(Dunn, Matt)
4/18/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#365 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [357] MOTION for Protective Order (Attachments: # (1) Exhibit A)(Nelson, James)

Date	Staff	Amount of Time	Description
4/18/2016	JF	0.2	ME/JF Meet to discuss the latest Kellogg case developments (update given by ME) 0.2
4/18/2016	JP	0.2	ms/jp discuss discovery review issues in light of postponed 30b6
			Send claimant's emails (produced by Kellogg) to MD to prepare for claimant's deposition
4/18/2016	JF	0.1	0.1
4/18/2016	MS	0.2	ms/jp discuss discovery review issues in light of postponed 30b6
4/18/2016	ME	0.2	JF/ME Meet to discuss the latest Kellogg case developments (update given by ME) 0.2
4/18/2016	ME	0.8	research termination dates for named plaintiffs
4/18/2016	JF	0.3	Contact claimant to confirm depo preparation details 0.3
4/18/2016	ME	0.2	telephone call from opt-in for update
4/18/2016	KIM	0.2	Review research on late disclosure of expert witness.
4/18/2016	MS	0.5	meetand confer w/ OC re outstanding discovery
4/18/2016	MS	0.8	legal research on motion to strike experts
4/18/2016	MS	0.1	meetand confer w/ OC re failure to provide expert reports
4/18/2016	MD	1.5	review documents for deposition 1.5
4/18/2016	MD	1.5	review documents for 30b6 deposition 1.5
4/18/2016	MS	0.7	tc w/ ET re certification proof issues
4/18/2016	MS	0.6	drafting letter to Kellogg re five add'l depositions
			MS KW meet to discuss research memo needed to cover production of trial plans in 9th
4/18/2016	MS	0.4	Circuit.
4/18/2016	MD	3.5	prep client for deposition 3.5
4/18/2016	JF	2.3	Search Kellogg production for relevant documents (30b6 outline) 2.3
4/18/2016	ME	2.2	work on deposition digest for named plaintiff
4/18/2016	JF	0.1	Confirm depo prep details via email addressed to claimant 0.1
4/19/2016	JP	0.3	JP/ME discuss tasks needed to complete to prepare for end of discovery
4/19/2016	ME	0.3	JP/ME discuss tasks needed to complete to prepare for end of discovery
			JP/ME discuss communicating with clients about retaliation concerns regarding the
4/19/2016	ME	0.2	recent restructure
4/19/2016	ME	0.6	edit deposition digest for named plaintiff according to deposition digest outline
4/19/2016	MS	5.8	drafting motion to strike expert testimony, including legal research
4/19/2016	ME	0.2	send email to MD with depo digests to review and questions about process
4/19/2016	KIM	1.5	Westlaw research on portion of Motion to Compel about trial plans
			JP/ME discuss communicating with clients about retaliation concerns regarding the
4/19/2016	JP	0.2	recent restructure
4/19/2016	ME	0.2	read defendants' disclosure of expert testimony
4/19/2016	ME	0.9	complete deposition digest for named plaintiff
4/19/2016	MD	1	prepare client for deposition 1.0
4/19/2016	ME	1	edit deposition digest for named plaintiff according to deposition digest outline
4/19/2016	MD	7	defend deposition 7.0
4/19/2016	ME	0.1	ME/JF Discuss the meaning of "cross docks" (Kellogg production review) 0.1
4/19/2016	JF	3.9	Search Kellogg production for relevant documents (30b6 outline) 3.9
4/19/2016	JF	1.8	Search Kellogg production for relevant documents (30b6 outline) 1.8
4/19/2016	ME	1	work on deposition digest for named plaintiff
4/19/2016	MD	0.2	review GPS data with defense counsel 0.2
			calculate numbers regarding opt-in discovery responses for motion to strike expert
4/19/2016	ME	0.5	witness
4/19/2016	MD	0.3	discuss deposition with client after deposition 0.3

Date	Staff	Amount of Time	Description
4/19/2016	ME	0.1	file defendants' expert witness disclosure
4/19/2016	MD	8	travel back from deposition 8.0
4/19/2016	ME	0.6	review case file for tasks that might need to be completed prior to the end of discovery
4/19/2016	JF	0.1	ME/JF Discuss the meaning of "cross docks" (Kellogg production review) 0.1
4/20/2016	JS	0.2	ms/js discuss process for proofing and formatting
4/20/2016	KIM	0.3	Organize/file Westlaw research emails/attachments for Opp. Motion to Compel.
4/20/2016	JF	5.2	Deposition digest of claimant 5.2
4/20/2016	MS	0.2	ms/js discuss process for proofing and formatting
4/20/2016	MD	0.3	MD/ME review tasks to complete before the end of discovery
4/20/2016	MS	0.7	incorporating comments and revising motion to strike experts
4/20/2016	MS	0.3	preparing motion for proof reading and formatting
			retrieve user ID and password to download plaintiff deposition transcripts .2; attempt to
4/20/2016	ME	0.5	download transcripts .3
4/20/2016	ME	0.6	search defendants' email production for particular document
4/20/2016	ME	0.1	schedule litigation team meeting
4/20/2016	MD	1	review motion to strike expert 1.0
4/20/2016	MS	0.2	review Kellogg's new time tracking program
4/20/2016	MD	0.2	ms/md discuss strategy for ensuring we get 30(b)(6) within discovery period
4/20/2016	ME	0.5	ME/JF Review the depo digest task 0.5
4/20/2016	MS	0.2	ms/md discuss strategy for ensuring we get 30(b)(6) within discovery period
4/20/2016	ME	0.3	work on deposition digest for named plaintiff
4/20/2016	MD	2	drafting motion to compel dsd documents 2.0
4/20/2016	JF	0.5	ME/JF Review the depo digest task 0.5
4/20/2016	ME	0.1	JK/ME review issues with downloading plaintiff's transcript for court reporter's website
4/20/2016	JK	0.1	JK/ME review issues with downloading plaintiff's transcript for court reporter's website
4/20/2016	ME	0.3	MD/ME review tasks to complete before the end of discovery
			telephone call to court reporter to determine why files cannot be downloaded from their
4/20/2016	ME	0.3	website
			file hard copies of case documents: opt-in discovery documents, deposition transcripts,
4/20/2016	CLER	1	and correspondence
4/21/2016	ME	1.2	review opt-in discovery production to denote redacted documents
4/21/2016	KIM	2.2	Westlaw research on portion of Motion to Compel about trial plans
			formatt brief and create table of contents and table of authorities for motion to strike
4/21/2016	ME	2.5	defendants' expert witness
			download discovery data produced by defense counsel .1; file data and notify team of its
4/21/2016	ME	0.1	receipt .1; document receipt of production in tracking spreadsheet
4/21/2016	ME	0.1	telephone call with named plaintiff to determine dates available for deposition
4/21/2016	MR	0.2	read and reply to emails from MS and MD about Motus data
4/21/2016	JF	2.8	Deposition digest of claimant 2.8
			read and reply to email from MD about setting up call with Defense Counsel about Motus
4/21/2016	MR	0.1	data
			ECF Filing MOTION to Strike Defendants Expert Witnesses (Attachments: # (1) Exhibit A
4/21/2016	AG	0.2	Defendants' Expert Disclosure, # (2) Proposed Order) Noting Date 5/6/2016,



Date	Staff	Amount of Time	Description
			download production from defense counsel 1; document receipt of production in
4/21/2016	ME	0.2	tracking spreadsheet .1
4/21/2016	MS	0.2	consultation on citation for motion to strike
4/21/2016	MD	0.3	MD/MR phone discussion about Motus data
4/21/2016	MS	0.5	md/ms discuss case status and discovery needs 0.5
4/21/2016	MD	0.2	md/ms discuss results of MS discovery call with Boudreau 0.2
4/21/2016	ME	0.1	left voicemail for named plaintiff to determine deposition availability
4/21/2016	MD	0.5	md/ms discuss case status and discovery needs 0.5
4/21/2016	MD	0.2	write defense counsel re outstanding motus data 0.2
			examine email from Defense Counsel about Motus data .1, review our Motus data and compare with Defense Counsel screenshots .3, email to MD and team about difference in
4/21/2016	MR	0.6	Motus data .1, send followup email about same .1
4/21/2016	KIM	1	Westlaw research on portion of Motion to Compel about trial plans
4/21/2016	KIM	1.3	Westlaw research on portion of Motion to Compel about trial plans
4/21/2016	MS	0.2	md/ms discuss results of MS discovery call with Boudreau 0.2
4/21/2016	MS	0.2	email to J Boudreau with proposal for discovery extension and meet and confer
			MS/MD/ME/JF Meet to discuss: A. Discovery of plaintiffs 0.4 B. Discovery of Kellogg (documents needed and documents produced) 0.5 C. Motions in preparatory stages,
4/21/2016	MS	1.1	deadlines 0.2 Total time: 1.10
			MS/MD/ME/JF Meet to discuss: A. Discovery of plaintiffs 0.4 B. Discovery of Kellogg (documents needed and documents produced) 0.5 C. Motions in preparatory stages,
4/21/2016	ME	1.1	deadlines 0.2 Total time: 1.10
			MS/MD/ME/JF Meet to discuss: A. Discovery of plaintiffs 0.4 B. Discovery of Kellogg (documents needed and documents produced) 0.5 C. Motions in preparatory stages,
4/21/2016	MD	1.1	deadlines 0.2 Total time: 1.10
4/21/2016	MS	0.2	research on local rules for discovery conferences
4/21/2016	ME	0.1	left voicemail for named plaintiff to determine deposition availability
			write defense counsel re meet and confer re attorney advice because of waiver and
4/21/2016	MD	0.2	time/merchadising time data 0.2
			ECF Filing MOTION to Strike Defendants Expert Witnesses (Attachments: # (1) Exhibit A
4/21/2016	ME	0.2	Defendants' Expert Disclosure, # (2) Proposed Order) Noting Date 5/6/2016,
4/21/2016	KIM	1.7	Westlaw research on portion of Motion to Compel about trial plans
4/21/2016	MS	0.3	developing agenda for team meeting
4/21/2016	ME	0.3	prepare agenda for team meeting
4/21/2016	MR	0.3	MD/MR phone discussion about Motus data
4/21/2016	MS	0.9	review and revise motion to compel DSD docs
4/21/2016	ME	0.1	telephone call to named plaintiff to determine availability for deposition
4/21/2016	ME	0.3	review process for filing motion with Court
4/21/2016	MS	0.4	meet and confer re discovery w/ OC
4/21/2016	MD	3	drafting motion to compel DSD documents 3.0
4/21/2016	ME	0.2	telephone call with opt-in for case update
			MS/MD/ME/JF Meet to discuss: A. Discovery of plaintiffs 0.4 B. Discovery of Kellogg (documents needed and documents produced) 0.5 C. Motions in preparatory stages,
4/21/2016	JF	1.1	deadlines 0.2 Total time: 1.10
4/21/2016	MS	0.5	analysis and comments on Motus/CRS production
4/21/2016	JF	0.1	Compose email to MD re Publix's Automated Replenishment document 0.1
4/21/2016	MS	0.2	outline stip for discovery extension
4/21/2016	MR	0.1	read and reply to email from ME about saving password to files

Date	Staff	Amount of Time	Description
4/21/2016	JF	0.4	Perform DT Search for keywords "Kellogg roadshow" 0.4
4/22/2016	MS	0.2	follow up on proposed order for MTS
4/22/2016	ME	0.5	work on formatting joint stipulation brief
4/22/2016	KIM	2.5	Synthesize cases about trial plans for memo for opp to motion to compel.
4/22/2016	ME	1.4	review opt-in production to track redacted documents
4/22/2016	MS	0.1	tc to OC re conferencew/ Court
4/22/2016	AG	0.7	Legal research on briefing via PACER ( D. Motions to Compel Discovery Concerning P. Trail Plan in Martin v. Citizens Financial Group)
4/22/2016	MS	0.2	review Kellogg comments on stip and revise and recirculate
4/22/2016	ME	0.2	telephone call with opt-in regarding separation agreement
4/22/2016	AG	0.2	Email Proposed Order to Judge as per court rules (Prosposed Order Granting Plaintiffs' Motion to Strike Defendants Expert Witnesses)
4/22/2016	ME	0.2	Email Proposed Order to Judge as per court rules (Prosposed Order Granting Plaintiffs' Motion to Strike Defendants Expert Witnesses)
4/22/2016	MS	0.2	review Kellogg comments on stip and revise and recirculate
4/22/2016	MS	1.3	drafting statement of facts for discovery
4/22/2016	MS	0.2	finalizing stip and sending for formatting
4/22/2016	MS	0.6	draft stipulation for extending discovery deadlines
4/22/2016	MS	0.3	court conf on stip to extend discovery
4/22/2016	MR	0.5	create two screenshots of our Motus data to send to Defense counsel .4, send email with screenshots to team with explanation .1
4/22/2016	MD	0.1	review documents to be produced by Perteete 0.1
4/22/2016	ME	0.2	download and save opt-in's deposition transcript .1; email transcript to opt-in for review
4/22/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#367 - MINUTE ORDER re [347] Kellogg's MOTION for Reconsideration: Plaintiffs moved to compel production of a time-motion study prepared by Kelloggs consulting firm, Willard Bishop [Dkt. #311]. The Court ordered Kellogg to produce the Willard Bishop Study [Dkt. # 337]. Kellogg moved for reconsideration [Dkt. #347], arguing the study is a privileged communication and work product. Plaintiffs argue reconsideration is inappropriate because Kellogg did not present the Study to the Court when it opposed Plaintiffs Motion to Compel. Plaintiffs are incorrect that the Court cannot review a withheld document to determine whether it is privileged or not. Kelloggs Motion for Reconsideration [Dkt. #347] is GRANTED. Kellogg shall produce the Willard Bishop Study for in camera review
4/22/2016	KIM	1.2	within ten days of this Order; as directed by Judge Ronald B. Leighton. (DN)
4/22/2016	KIM	1.5	Synthesize cases about trial plans for memo for opp to motion to compel.
4/22/2016	KIM	1.5	Write memo about trial plans for opp motion to compel.
4/22/2016	ME	0.2	download and save opt-in's deposition transcript .1; email transcript to opt-in for review
4/22/2016	KIM	1.2	Synthesize cases about trial plans for memo for opp to motion to compel.
4/22/2016	ME	0.1	email named plaintiff to contact our office regarding deposition availability
4/22/2016	ME	0.1	email named plaintiff to contact our office about deposition availability
4/22/2016	ME	2.2	review opt-in production to track redacted documents
4/22/2016	ME	0.2	scan opt-in's discovery documents to prepare for production to defense counsel

Date	Staff	Amount of Time	Description
			Transfer documents recd from ECF system to docket file and create file copy (Docket#366 - MOTION to Strike Defendants Expert Witnesses by Plaintiff Patty Thomas. (Attachments: # (1) Exhibit A Defendants' Expert Disclosure, # (2) Proposed Order) Noting
4/22/2016	CLER	0.1	Date 5/6/2016, (Sweeney, Michael)
			prepare opt-in's discovery documents for production by reviewing .1; bates stamping .2;
4/22/2016	ME	0.4	sending to defense counsel .1
4/22/2016	AG	2	conduct PACER Bankruptcy search (all plaintiffs)
4/22/2016	ME	0.1	read emails with defense counsel about issues with discovery production
4/22/2016	ME	0.2	telephone call with named plaintiff about deposition availability
4/22/2016	JF	4.8	Deposition digest of claimant's testimony 4.8
4/25/2016	JF	3.4	Deposition digest of claimant's testimony 3.4
			md/ms discuss results of Judge Leighton's order for 30b6 deposition and strategize on
4/25/2016	MD	0.2	next steps 0.2
4/25/2016	MS	0.4	finalizing and circulating stip to extend discovery
4/25/2016	MS	4.1	drafting opposition to MTC rog responses
4/25/2016	MS	2.1	drafting outline for opposition to MTC rog responses
			md/ms discuss results of Judge Leighton's order for 30b6 deposition and strategize on
4/25/2016	MS	0.2	next steps 0.2
4/25/2016	KIM	0.8	Read third amended complaint (stop at p 21)
4/25/2016	JS	0.3	JS/ME review formatting of joint stipulation
4/25/2016	ME	0.3	JS/ME review formatting of joint stipulation
4/25/2016	KIM	1.2	Additional research on trial plans
4/25/2016	KIM	0.8	Additional research on trial plans
			Transfer documents recd from ECF system to docket file and create file copy (Docket#368
4/25/2016	CLER	0.1	- STIPULATION (JOINT) by parties (Sweeney, Michael)
4/25/2016	JF	0.1	Call from claimant re the case 0.1
4/25/2016	KIM	0.5	MS KW meet RE research on (de-/)certification standard in 9th Cir.
			drafting motion to compel attorney client privilege documents based on good faith
4/25/2016	MD	1.5	defense 1.5
			input information about opt-ins into deposition tracking spreadsheet to prioritize
4/25/2016	ME	1	deposition digesting
4/25/2016	MD	2.5	editing statement of facts 2.5
4/25/2016	MD	0.2	md/ms discuss discovery status, including discovery needed 0.2
4/25/2016	AG	0.1	ECF Filing of JOINT STIPULATION
4/25/2016	JS	0.2	format stip; email breakdown of changes to ME
4/25/2016	ME	1.8	review documents produced by opt-ins to track redactions
4/25/2016	KIM	0.6	Organize files from past three research assignments
			review defendant documents found during keyword search to prepare for 30b6
4/25/2016	ME	0.2	deposition
4/25/2016	KIM	1.2	Finish memo on discoverability of trial plans for opp motion to compel.
4/25/2016	ME	0.1	file electronic copies of opt-in's deposition transcript
4/25/2016	ME	0.1	email deposition transcript to opt-in for review
4/25/2016	AG	0.2	discussion on kellogg bankruptcy project
4/25/2016	ME	1.5	work on deposition digest for named plaintiff
4/25/2016	ME	0.3	format joint stipulation; email to MS
4/25/2016	AG	2.3	conduct PACER Bankruptcy search (all plaintiffs)
4/25/2016	MS	0.3	md/ms discussing arguments re trial plan and procedure 0.3
4/25/2016	ME	0.2	telephone call from opt-in for case update
4/25/2016	MS	0.5	MS KW meet RE research on (de-/)certification standard in 9th Cir.
4/25/2016	MD	0.2	discussion on kellogg bankruptcy project

Date	Staff	Amount of Time	Description
4/25/2016	AG	3.4	conduct PACER Bankruptcy search (all plaintiffs)
4/25/2016	MS	0.2	md/ms discuss discovery status, including discovery needed 0.2
4/25/2016	MD	0.3	md/ms discussing arguments re trial plan and procedure 0.3
4/25/2016	MS	0.2	discussion on kellogg bankruptcy project
4/26/2016	ME	0.2	email proposed order for Joint Stipulation to Judge
4/26/2016	ME	0.3	MD/ME review opt-in's concern about issue with payment from Kellogg
4/26/2016	KIM	2	Westlaw research on work product privilege
4/26/2016	ME	0.2	MR/ME review issue downloading production sent by defense counsel
4/26/2016	MR	0.2	MR/ME review issue downloading production sent by defense counsel
4/26/2016	JF	0.7	JF/ME discuss experience with deposition digests to refine the process and compile questions for attorneys
4/26/2016	ME	0.1	file named plaintiff deposition notices
4/26/2016	ME	1.5	save named plaintiff's emails and attachments to prepare for producing to defense counsel
4/26/2016	ME	0.1	MD/ME discuss contacting named plaintiff about deposition availability
4/26/2016	KIM	1.9	Make edits to draft opp motion to compel.
4/26/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#369 - ORDER granting in part and denying in part [357] Defendants' Motion for Protective Order; as more fully set forth herein; signed by Judge Ronald B. Leighton.(DN)
4/26/2016	AG	0.3	AG/JF/ME discuss defendants' request for list of opt-ins who have filed bankruptcy
4/26/2016	JF	0.3	AG/JF/ME discuss defendants' request for list of opt-ins who have filed bankruptcy
4/26/2016	ME	0.7	JF/ME discuss experience with deposition digests to refine the process and compile questions for attorneys
4/26/2016	KIM	1.3	Review draft opp motion to compel for edits.
4/26/2016	ME	0.3	download and save production sent by defense counsel .2; track production .1
4/26/2016	MD	0.1	MD/ME discuss contacting named plaintiff about deposition availability
4/26/2016	MD	0.3	MD/ME review opt-in's concern about issue with payment from Kellogg
4/26/2016	AG	3	conduct PACER Bankruptcy search (all plaintiffs)
4/26/2016	ME	0.1	file opt-in's discovery document
4/26/2016	AG	2.8	conduct PACER Bankruptcy search (all plaintiffs)
4/26/2016	ME	0.1	left voicemail for opt-in to return call
4/26/2016	ME	0.1	email opt-in about discovery documents
4/26/2016	ME	0.3	AG/JF/ME discuss defendants' request for list of opt-ins who have filed bankruptcy
4/26/2016	JF	0.2	ME/JF Consult over the phone to address specific depo digest questions 0.2
4/26/2016	JF	0.2	Send MS an email with Johnson's depo digest to review 0.2
4/26/2016	JF	4.2	Deposition digest of claimant's testimony 4.2
4/26/2016	ME	0.2	telephone call from intake .1; notes from the conversation .1
4/26/2016	ME	0.1	email named plaintiff about deposition availability
4/26/2016	ME	0.1	email named plaintiff about deposition availability
4/26/2016	KIM	0.8	Finish edits to opp mot compel
4/26/2016	MS	4.9	drafting opposition to MTC rog responses
4/26/2016	ME	0.2	ME/JF Consult over the phone to address specific depo digest questions 0.2
4/27/2016	ME	0.2	email MD about prioritizing tasks
4/27/2016	ME	0.1	KIM/ME discuss next steps for editing opposition for discovery of trial plan
4/27/2016	KIM	0.3	File/organize research/correspondence from opp. mot. compel trial plan.
4/27/2016	MD	2	editing and finalizing filing re litigation interrogatories 2.0

Date	Staff	Amount of Time	Description
4/27/2016	MA	0.7	proofreading opposition for discovery of trial plan
4/27/2016	MA	0.5	assist ME in creating table of contents and table of authorities
4/27/2016	KIM	0.1	Draft internal correspondence about attorney review of latest draft of opp mot compel trial plan.
4/27/2016	ME	0.3	compile named plaintiff deposition availability into one document and email to litigation team
4/27/2016	MD	0.4	MD/KM/ME make final edits to opposition to defendants' motion to compel responses to interrogatories .2; file with the court .2
4/27/2016	KIM	0.4	MD/KM/ME make final edits to opposition to defendants' motion to compel responses to interrogatories .2; file with the court .2
4/27/2016	ME	0.2	telephone call to named plaintiff about deposition availability
4/27/2016	ME	0.1	ME/JF Consult the manner in which to prioritize depo digests 0.1
4/27/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#370 - ORDER on STIPULATION re [368] Extension of Deadlines as set forth in this Order: Discovery completed by 5/16/2016, Dispositive motions due by 6/17/2016; signed by Judge Ronald B. Leighton. (DN)
4/27/2016	KIM	1	Review newest draft of opp mot compel trial plan
4/27/2016	JF	5.9	Deposition digest of claimant's testimony 5.9
4/27/2016	JF	0.1	ME/JF Consult the manner in which to prioritize depo digests 0.1
4/27/2016	ME	3	format brief and create table of contents and table of authorities for opposition to defendants' motion to compel responses to interrogatories
4/27/2016	KIM	1.9	Review latest draft of opp mot compel trial plan.
4/27/2016	AG	5.5	conduct PACER Bankruptcy search (all plaintiffs)
4/27/2016	ME	0.4	redact privilege information from plaintiff's documents to prepare for producing to defense counsel
4/27/2016	KIM	0.3	Research standard for (de-/)/certification in 9th cir.
4/27/2016	ME	0.1	MD/ME discuss priority of paralegal tasks to be completed
4/27/2016	MD	0.1	MD/ME discuss priority of paralegal tasks to be completed
4/27/2016	ME	0.4	MD/KM/ME make final edits to opposition to defendants' motion to compel responses to interrogatories .2; file with the court .2
4/27/2016	KIM	0.3	Research citation questions for opp mot compel trial plan
4/27/2016	ME	0.2	search defendant's production for document requested by MD
4/27/2016	ME	0.1	compare opposing counsel's availability for named plaintiff depositions to plaintiffs' availability
4/27/2016	KIM	0.1	KIM/ME discuss next steps for editing opposition for discovery of trial plan
4/27/2016	ME	1.5	prepare plaintiff's documents for production to defense counsel: save files as pdf .9; redact privilege information .6
4/28/2016	ME	0.2	MS/ME discuss speaking with named plaintiffs to schedule depositions and deposition preps
4/28/2016	ME	0.9	MS/KIM/JF/ME provide summary of case status including recent and outstanding motions .3; discuss timeline for completion of deposition digests .1; review statement of facts outline and paralegal work needed to prepare for 30b6 deposition .5
4/28/2016	ME	0.1	telephone conversation with opt-in about deposition transcript review .1; notes from conversation .1
4/28/2016	ME	0.1	MS/ME review information about named plaintiff deposition preparation
4/28/2016	CLER	0.3	download and file documents produced by defense counsel .1; track production .1; email links to production to litigation team .1

Date	Staff	Amount of Time	Description
4/28/2016	JF	0.9	MS/KIM/JF/ME provide summary of case status including recent and outstanding motions .3; discuss timeline for completion of deposition digests .1; review statement of facts outline and paralegal work needed to prepare for 30b6 deposition .5
4/28/2016	KIM	0.9	MS/KIM/JF/ME provide summary of case status including recent and outstanding motions .3; discuss timeline for completion of deposition digests .1; review statement of facts outline and paralegal work needed to prepare for 30b6 deposition .5
4/28/2016	MS	0.2	MS/ME discuss speaking with named plaintiffs to schedule depositions and deposition preps
4/28/2016	KIM	1	Research our judge's Rule 23 cert/decert decisions
4/28/2016	MS	0.9	MS/KIM/JF/ME provide summary of case status including recent and outstanding motions .3; discuss timeline for completion of deposition digests .1; review statement of facts outline and paralegal work needed to prepare for 30b6 deposition .5
4/28/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#372 - STIPULATION AND PROPOSED ORDER EXTENDING TIME TO REPLY AND AMENDING NOTING DATE RE: DEFENDANTS' MOTION TO COMPEL RESPONSES TO INTERROGATORIES by parties re [363] MOTION to Compel Responses to Interrogatories (Nelson, James)
4/28/2016	MS	0.3	review and revise Statement of Facts and circulate
4/28/2016	MS	0.3	tc w/ OC re depo dates, response to MTC, and withdrawing witnesses
4/28/2016	KIM	1.7	Research 9th cir. standard for (de-/ )certification [1.0], read cases from that research [0.7]
4/28/2016	MS	0.5	review and revise subpoena to Motus and arrange for service
4/28/2016	JF	2.6	Deposition digest of claimant's testimony 2.6
4/28/2016	MS	0.2	reivew and prepare notes for team mtg
4/28/2016	ME	0.3	read defendants' motion to compel responses to interrogatories
4/28/2016	ME	0.4	read Plaintiffs' statement of facts to prepare for team meeting
4/28/2016	KIM	2	Research 9th cir. standard for (de-/ )certification [1.0], read cases from that research [0.7], read draft statement of facts [0.3]
4/28/2016	ME	1.4	bates stamp plaintiff's discovery documents to prepare for production to defense counsel
4/28/2016	MS	0.1	MS/ME review information about named plaintiff deposition preparation
4/28/2016	JF	0.3	Review the case docket for the latest filings in the case 0.3
4/28/2016	AG	6.1	conduct PACER Bankruptcy search (all plaintiffs)
4/28/2016	JF	0.5	Review statement of facts in anticipation of the weekly case meeting 0.5
4/28/2016	ME	0.2	telephone call from opt-in for case update
4/28/2016	ME	0.3	bates stamp plaintiff's documents to prepare for production to defense counsel
4/28/2016	AG	0.2	arange court reporter and location (30b5)
4/28/2016	ME	0.1	email MD about named plaintiff deposition availability
4/28/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#371 - RESPONSE, by Plaintiff Patty Thomas, to [363] MOTION to Compel Responses to Interrogatories. (Dunn, Matt)
4/29/2016	JS	0.3	JS/JF Discuss the latest Motion filled by the Defendant (re LinkedIn profiles) 0.3 attempt to contact named plaintiffs to confirm deposition date and schedule deposition
4/29/2016	ME	0.5	preparations
4/29/2016	KIM	1.9	Read cases for 9th cir (de-/ )certification standard.



Date	Staff	Amount of Time	Description
4/29/2016	AG	0.7	prepare service of subpoena ( cc D. proof of service)
4/29/2016	MS	0.1	follow up with OC re plaintiff depo dates
4/29/2016	ME	0.4	read defendants' motion to compel linkedin evidence
4/29/2016	JK	1.5	Convert 293 emails from pst to pdf
4/29/2016	ME	0.2	telephone call from intake for update .1; send email to ask attorneys for update .1
4/29/2016	MD	0.2	read defense counsel motion to compel linkedin account info 0.2
4/29/2016	ME	0.2	telephone call to intake to schedule time to speak with attorney .1; calendar the call .1
4/29/2016	DG	0.4	read def motion to compel linked-in .4
4/29/2016	KIM	2.2	Read cases for 9th cir (de-/)/certification standard.
4/29/2016	ME	1.4	compile documents to prepare for named plaintiff depositions
4/29/2016	MD	0.2	md/mr discuss ESI issues follow-up 0.2
4/29/2016	ME	0.3	JF/ME assign sections of statement of facts to each paralegal to insert supporting documents
4/29/2016	MD	0.2	MD/ME discuss confirming deposition dates and scheduling deposition preps with named plaintiffs
4/29/2016	ME	0.2	MD/ME discuss confirming deposition dates and scheduling deposition preps with named plaintiffs
4/29/2016	ME	0.1	email MD about opt-in deposition transcript review
4/29/2016	ME	0.3	save emails sent to clients to client database
4/29/2016	JK	0.2	JK/ME discuss saving clients msgs files to pdf
4/29/2016	ME	0.3	telephone call with named plaintiff to confirm deposition date and schedule preparation with attorney .2 email confirmation to plaintiff .1
4/29/2016	MR	0.2	md/mr discuss ESI issues follow-up 0.2
4/29/2016	ME	0.3	review plaintiff's documents to determine most efficient way to prepare documents for production to defense counsel
4/29/2016	CLER	0.2	download and file documents produced by defense counsel .1; track receipt of documents and email links to the documetns to team members .1
4/29/2016	JF	0.3	JF/ME assign sections of statement of facts to each paralegal to insert supporting documents
4/29/2016	ME	0.4	create spreadsheet to track named plaintiff deposition scheduling
4/29/2016	JF	0.1	ME/JF Brief consult over the phone re document relevance (promotional contracts) 0.1
4/29/2016	ME	0.1	ME/JF Brief consult over the phone re document relevance (promotional contracts) 0.1
4/29/2016	JF	2.3	Link documents to Statement of Facts 2.3
4/29/2016	JF	0.3	JS/JF Discuss the latest Motion filled by the Defendant (re LinkedIn profiles) 0.3
4/29/2016	JF	1.3	Deposition digest of claimant's testimony 1.3
4/29/2016	MD	0.1	write defense counsel about outstanding discovery 0.1
4/29/2016	ME	0.3	calendar times for MD to contact named plaitntiffs to confirm deposition dates
4/29/2016	MD	0.3	write draft email re outstanding ESI issues 0.3
4/29/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#373 - MOTION to Compel LinkedIn Evidence by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Exhibit A, # (2) Exhibit B, # (3) Exhibit C, # (4) Exhibit D, # (5) Exhibit E, # (6) Proposed Order) Noting Date 5/13/2016, (Nelson, James)
4/29/2016	JF	0.5	Review documents in folder #20 in anticipation of future filings in the case (Statement of Facts) 0.5

Date	Staff	Amount of Time	Description
4/29/2016	KIM	0.5	Read cases for 9th cir (de-/)/certification standard.
4/29/2016	ME	0.2	JK/ME discuss saving clients msgs files to pdf
4/29/2016	KIM	2.5	Read cases for 9th cir (de-/)/certification standard.
5/2/2016	MR	0.8	examine stray csv native files showing preliminary discovery and compare with actual production
5/2/2016	JF	3.5	Link documents to Statement of Facts 3.5
5/2/2016	ME	0.8	bates stamp plaintiff's documents to prepare them for production to defense counsel
5/2/2016	MR	0.9	write up remaining details of issues relating to topics such as Motus .2, Supply Chain .2, Privilege logs .2 and Time studies .3
5/2/2016	MD	0.1	MD/ME discuss plaintiffs' availability for depositions
5/2/2016	MR	0.4	recreate dtsearch index for large Kellogg production of opt-in emails .3, check on OCR process .1
5/2/2016	ME	1.1	save attachments to plaintiff's emails to prepare them for production to defense counsel
5/2/2016	MR	0.4	review sync of handhelds data .3, compose email about same including depo extract .1
5/2/2016	MR	0.1	assist para ME with client files to produce
5/2/2016	ME	0.2	file scanned correspondence
5/2/2016	MR	0.4	examine production for autoship data .2, compose email to team about same, including section of ESI deposition on autoships .2
5/2/2016	ME	0.1	verify that defendant has not moved to dismiss opt-in who called JF for update
5/2/2016	MR	0.1	email to MD about management suite IDs
5/2/2016	CLER	0.1	create PDF format of correspondence recd from D. ( ltr to Judge Letighton from D. (Bishop document)
5/2/2016	MR	0.4	create encrypted volume for OCR docs .1, commence OCR process of first set of management email production .3
5/2/2016	ME	0.2	email plaintiffs' addresses to MD and MS for purposes of scheduling depositions
5/2/2016	MR	0.2	examine old email listing sources of timestamps
5/2/2016	MR	0.8	review ESI depositions and depo extracts
5/2/2016	MR	0.3	review ARIFleet and CRS data .2, compose email to MD about same .1
5/2/2016	MR	0.6	examine privilege logs and write up additional problems with them .5, send email about same to team .1
5/2/2016	JF	3.1	Link documents to Statement of Facts 3.1
5/2/2016	CLER	0.1	create PDF format of correspondence recd from D. ( response to email 4.21.2016)
5/2/2016	ME	0.1	JF/ME discuss status of document compilation for state of facts
5/2/2016	ME	0.1	left message for named plaintiff to reschedule deposition
5/2/2016	ME	0.1	left voicemail for intake to set up time to speak with attorney
5/2/2016	ME	2	redact plaintiff's documents to prepare for production to defense counsel
5/2/2016	ME	0.1	email named plaintiff to contact us to reschedule deposition
5/2/2016	MR	0.9	review email load files for "from" and "author" columnar info .6, compose additional part detailing problems with lack of info .2, send email about same .1
5/2/2016	ME	0.1	telephone call to named plaintiff to reschedule deposition
5/2/2016	JF	0.1	JF/ME discuss status of document compilation for state of facts
5/2/2016	MD	0.1	MD/ME discuss rescheduling named plaintiffs' depositions
5/2/2016	MD	0.1	MD/ME discuss outcome of telephone call with intake
5/2/2016	ME	0.1	MD/ME discuss plaintiffs' availability for depositions

Date	Staff	Amount of Time	Description
5/2/2016	JF	0.2	Call from claimant regarding case update 0.2
5/2/2016	ME	0.1	MD/ME discuss outcome of telephone call with intake
5/2/2016	ME	0.1	MD/ME discuss rescheduling named plaintiffs' depositions
5/3/2016	KIM	4	Review def's MTC (.6); review motions before prior order (.4); review prior order (.4); research discovery of resumes, social media, linkedin (1.1); research whether MTC is really M for reconsideration (.5); review md's history of discovery (1)
5/3/2016	MS	0.1	MS/JF Review specific documents linked to the Statement of Facts draft 0.1
5/3/2016	ME	0.8	contact/attempt to contact named plaintiffs to notify them of deposition date change and reschedule deposition preparations
5/3/2016	ME	0.8	bates stamp plaintiff's documents to prepare for production to defense counsel
5/3/2016	ME	1.3	compile documents to support statement of facts
5/3/2016	KIM	3.5	Research cert/decert decisions in 9th Cir.
5/3/2016	JF	0.1	MS/JF Review specific documents linked to the Statement of Facts draft 0.1
5/3/2016	ME	0.2	download and save defendants' production .1; track production and email to team .1
5/3/2016	ME	0.3	compile documents to support statement of fact
5/3/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#379 - ORDER on STIPULATION [372] re [363] MOTION to Compel Responses to Interrogatories : Re-Noted for 5/6/2016; signed by Judge Ronald B. Leighton. (DN)
5/3/2016	MS	0.2	review, revise and circulate draft stipulation for Kellogg to withdraw expert testimony
5/3/2016	JF	6.2	Link documents to Statement of Facts 6.2
5/3/2016	MS	0.7	review, revise and serve list of bankruptcy claimants to Kellogg in response to request
5/3/2016	MS	0.2	ms/kw discuss approach to responding to MTC linked in
5/3/2016	ME	0.4	search for supporting documents for statement of facts
5/3/2016	MS	0.3	draft and circulate outline for responding to MTC linked in
5/3/2016	ME	0.2	telephone call from named plaintiff to schedule deposition
5/3/2016	MS	0.2	tc w/ OC re deposition dates for 30b6, Salmon, and O'Connell
5/3/2016	MS	0.1	ms/md discuss proposed 30b6 depo dates
5/3/2016	AG	0.2	cancellation of deposition (30b(6))
5/3/2016	MS	0.2	ms/md discuss status of discovery and various outstanding issues
5/3/2016	MD	0.1	ms/md discuss proposed 30b6 depo dates
5/3/2016	CLER	2.5	Data Entry (clients filing dates of bankruptcy)
5/3/2016	ME	1.1	review discovery documents produced by defense counsel to locate useful information for 30b6 deposition and summary judgement
5/3/2016	MD	0.2	ms/md discuss status of discovery and various outstanding issues
5/3/2016	ME	0.6	bates stamp plaintiff's documents to prepare for production to defense counsel
5/3/2016	ME	0.4	compile documents to support statement of fact
5/3/2016	MS	0.3	ms/kw/md discuss response to MTC Linked In
5/3/2016	MD	0.1	MD/ME discuss rescheduling named plaintiff depositions
5/3/2016	MD	0.3	ms/kw/md discuss response to MTC Linked In
5/3/2016	MR	0.2	MR/ME review documents produced by defendants'
5/3/2016	KIM	0.2	ms/kw discuss approach to responding to MTC linked in
5/3/2016	ME	0.2	MR/ME review documents produced by defendants'
5/3/2016	MS	0.3	ms/kw/md discuss response to MTC Linked In

Date	Staff	Amount of Time	Description
5/3/2016	ME	0.1	MD/ME discuss rescheduling named plaintiff depositions
5/4/2016	KIM	0.7	Research professionalism / accusations of misconduct
5/4/2016	ME	2.6	compile documents to support statement of facts
5/4/2016	ME	0.1	ME/JF Update on the Statement of Facts document linking project 0.1
5/4/2016	MR	0.1	ms/mr discuss info needed for Motus depo
5/4/2016	MS	0.2	2 emails to mr re info needed for Motus depo
5/4/2016	MD	0.1	MD/ME discuss scheduling named plaintiff depositions
5/4/2016	MS	0.3	various emails w/ Motus counsel re depo
5/4/2016	KIM	1.3	Cf linkedin with resumes in discovery (.6) case law (.7)
5/4/2016	MS	0.1	ms/mr discuss info needed for Motus depo
5/4/2016	ME	0.1	email named plaintiff to set up time for deposition preparation
Transfer documents recd from ECF system to docket file and create file copy (Docket#375 - NOTICE to Withdraw Pending Motion re [366] MOTION to Strike Defendants Expert			
5/4/2016	CLER	0.1	Witnesses ; by Defendants Kellogg Company, Kellogg Sales Company. (Nelson, James)
5/4/2016	ME	0.4	compile documents to support statement of facts
compile exhibits used in opt-in depositions for plaintiffs' response to defendants' motion			
5/4/2016	ME	1.3	to compel
5/4/2016	MS	0.4	research into record regarding Kellogg access to Linked In
5/4/2016	ME	0.3	compile documents to support statement of facts
5/4/2016	KIM	0.8	Research professionalism / accusations of misconduct
5/4/2016	JK	0.9	Jk investigate methods for determining who views linked in pages
5/4/2016	MS	0.3	md/ms discussing arguments re compel linkedin account data 0.3
5/4/2016	JF	0.1	ME/JF Update on the Statement of Facts document linking project 0.1
5/4/2016	MD	0.3	md/ms discussing arguments re compel linkedin account data 0.3
Transfer documents recd from ECF system to docket file and create file copy (NOTICE of Docket Text Modification re [375] Stipulated MOTION : corrected event type to put on			
5/4/2016	CLER	0.1	the court's motions docket. (CMG)
Transfer documents recd from ECF system to docket file and create file copy (Docket#376 - ORDER granting [375] Stipulated Motion Withdrawing Pending Motion to Strike [366];			
5/4/2016	CLER	0.1	signed by Judge Ronald B. Leighton.(DN)
5/4/2016	ME	0.1	telephone call from intake to schedule time to speak with attorney
MR/ME discuss defendants' motion to compel .1; discuss status of preparing defendants'			
5/4/2016	ME	0.3	production for more efficient searching .2
5/4/2016	KIM	1.5	Research linkedin for MTC
5/4/2016	MS	0.2	t conf w/ Motus counsel re depo
5/4/2016	JF	4.6	Link evidentiary documents to Statement of Facts 4.6
5/4/2016	ME	0.1	MD/ME discuss scheduling named plaintiff depositions
MR/ME discuss defendants' motion to compel .1; discuss status of preparing defendants'			
5/4/2016	MR	0.3	production for more efficient searching .2
ME/JF Clarify the meaning/impact of time studies (Groulx and Willard-Bishop) for the			
5/5/2016	JF	0.1	purposes of Statement of Fact document compilation project 0.1
5/5/2016	ME	0.1	left messages for named plaintiff about deposition
5/5/2016	ME	0.1	read correspondence regarding 30b6 deposition
review opt-ins' interrogatory responses to find testimony to support the statement of			
5/5/2016	ME	2.1	facts
5/5/2016	JF	0.1	Email ME about no email after 6PM policy for Kellogg employees 0.1
5/5/2016	ME	0.1	email named plaintiff information about deposition date
5/5/2016	JF	4.4	Link evidentiary documents to Statement of Facts 4.4
5/5/2016	ME	2.6	compile discovery documents to support the statement of facts

Date	Staff	Amount of Time	Description
5/5/2016	KIM	2.8	Expand outline of MTC linkedin.
5/5/2016	ME	0.1	MD/ME discuss named plaintiff deposition scheduling
5/5/2016	KIM	0.8	Begin argument outline organization for MTC linkedin
5/5/2016	ME	0.1	ME/JF Clarify the meaning/impact of time studies (Groulx and Willard-Bishop) for the purposes of Statement of Fact document compilation project 0.1
5/5/2016	CLER	0.1	create PDF format of correspondence recd from Mintz Levin (Motus subpoena)
5/5/2016	KIM	1	MS/KW meet to discuss outline of response to MTC linkedin
5/5/2016	MD	0.1	MD/ME discuss named plaintiff deposition scheduling
5/5/2016	KIM	1.1	Expand outline of MTC linkedin.
5/6/2016	KIM	1.3	Work on MTC LinkedIn.
5/6/2016	ME	0.1	ME/JF Review section of Statement of facts re monitor of RSR time spent in stores 0.1
5/6/2016	ME	0.3	add links to documents to state of facts
5/6/2016	ME	1.3	compile information for plaintiffs' response to defendants' motion to compel LinkedIn profiles
5/6/2016	KIM	3.5	Work on MTC LinkedIn.
5/6/2016	JF	1.4	Link evidentiary documents to Statement of Facts 1.4
5/6/2016	ME	1.3	review plaintiff's documents to ensure all privilege information has been redacted before producing to defense counsel
5/6/2016	AG	0.3	arrange court reporter (MotusLLC)
5/6/2016	JF	3.8	Link evidentiary documents to Statement of Facts 3.8
5/6/2016	ME	0.1	calendar named plaintiff deposition preparation with MD
5/6/2016	ME	1.6	compile opt-in answer to interrogatories to support statement of facts
5/6/2016	ME	0.1	email named plaintiff about scheduling deposition preparation
5/6/2016	ME	0.1	email MD about named plaintiff's availability for deposition
5/6/2016	JF	0.1	ME/JF Review section of Statement of facts re monitor of RSR time spent in stores 0.1
5/6/2016	MA	0.4	proofreading opposition to motion to compel LinkedIn data
5/6/2016	ME	0.5	review defendants' discovery production for documents to support statement of facts
5/6/2016	MS	0.2	MS/ME discuss information needed for plaintiffs' response to defendants' motion to compel LinkedIn profiles
5/6/2016	ME	0.2	MS/ME discuss information needed for plaintiffs' response to defendants' motion to compel LinkedIn profiles
5/8/2016	KIM	1.5	Continue drafting opp mot compel LinkedIn data.
5/8/2016	KIM	1.7	Draft opp mot compel LinkedIn data.
5/9/2016	ME	0.1	MS/ME discuss filing opposition to defendants' motion to compel LinkedIn evidence
5/9/2016	ME	0.3	download, save, and track defendants' discovery production
5/9/2016	MS	0.1	MS/ME discuss filing opposition to defendants' motion to compel LinkedIn evidence
5/9/2016	JF	4.8	Link evidentiary documents to Statement of Facts 4.8
5/9/2016	JF	0.4	Read the latest filing by Defendants 0.4
5/9/2016	KIM	2	Finish last 2 seconds of opp mot compel LinkedIn data.
5/9/2016	MD	0.5	researching claims against other food supplies 0.5
5/9/2016	MD	0.1	email defense counsel re native production of logan groulx documents 0.1
5/9/2016	MD	0.1	left message for potential opt-in
5/9/2016	JF	0.2	Call from claimant re severance packet offer 0.2

Date	Staff	Amount of Time	Description
5/9/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#379 - RESPONSE, by Plaintiff Patty Thomas, to [373] MOTION to Compel LinkedIn Evidence. (Attachments: # (1) Exhibit 1 Volk Resume, # (2) Exhibit 2 Sweeney 4-5-16 letter, # (3) Exhibit 3 Industrial Standards Study)(Sweeney, Michael)
5/9/2016	ME	3.2	format opposition to defendants' motion to compel linkedin evidence
5/9/2016	MD	0.3	edit 30b6 deposition notice 0.3
5/9/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#377 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [363] MOTION to Compel Responses to Interrogatories (Nelson, James)
5/9/2016	KIM	2	Research additional cases for opp mot compel LinkedIn.
5/9/2016	ME	0.2	read defendants' reply brief in support of defendants' motion to compel responses to interrogatories
5/9/2016	AG	0.1	ECF Filing of RESPONSE to [373] MOTION to Compel LinkedIn Evidence. (Attachments: # (1) Exhibit 1 Volk Resume, # (2) Exhibit 2 Sweeney 4-5-16 letter, # (3) Exhibit 3 Industrial Standards Study)
5/9/2016	KIM	0.5	File/organize emails and research from opp mot compel LinkedIn data.
5/9/2016	ME	0.9	review plaintiff's documents to verify all privilege information has been redacted before producing to defense counsel
5/9/2016	MD	0.1	review deposition notices to plaintiffs 0.1
5/9/2016	ME	0.2	read defendants' letter in response to plaintiffs' email dated May 2, 2016 regarding outstanding discovery
5/9/2016	MD	0.3	review response to Kellogg's motion to compel linkedin discovery 0.3
5/9/2016	MD	0.3	review logan groulx documents produced by defense counsel 0.3
5/9/2016	CLER	0.1	create PDF format of correspondence recd from Jensen Litigation (Perteete transcriber)
5/9/2016	ME	0.5	compile documents in support of statement of facts
5/9/2016	MD	1.5	drafting motion to compel attorney client privilege documents 1.5
5/9/2016	MD	1.5	research waiver of attorney client privilege for motion to compel 1.5
5/9/2016	ME	0.1	MD/ME discuss incorrect times on defendants' depositions notices to named plaintiffs
5/9/2016	CLER	0.1	ECF Filing of MOTION to File Under Seal re [379] Response to Motion. (Attachments: # (1) Declaration of Michael J.D. Sweeney in Support of Plaintiffs Motion to File Documents Under Seal, # (2) Exhibit Exhibit A Boudreau 5-9-16 Email, # (3) Proposed Order) Noting Date 5/20/2016,
5/9/2016	JF	0.1	Draft an email re completion of the Statement of Facts project 0.1
5/9/2016	ME	0.5	verify date, time, and location of named plaintiff depositions as noticed by defendants
5/9/2016	ME	0.1	email opt-in link to case updates
5/9/2016	MD	0.1	MD/ME discuss incorrect times on defendants' depositions notices to named plaintiffs
5/9/2016	ME	0.2	telephone call from opt-in for case update .1; notes from conversation .1
5/9/2016	ME	0.1	email MD about call with intake
5/9/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#378-STIPULATION AND PROPOSED ORDER Extending Discovery Deadline and Briefing Schedules by parties (Nelson, James)
5/10/2016	MS	0.1	MS/JF Clarification re depo digest annotations 0.1
5/10/2016	ME	0.1	email MD regarding named plt depositions
5/10/2016	ME	0.2	telephone call from opt-in regarding documents .1; notes from conversation .1



Date	Staff	Amount of Time	Description
5/10/2016	JF	0.1	ME/JF Question re depo digest annotations 0.1
5/10/2016	ME	0.1	send emails to named plaintiffs regarding deposition date, time, and location
5/10/2016	MD	0.5	researching outside sales exemption 0.5
5/10/2016	ME	0.1	send plaintiff discovery documents to defense counsel
5/10/2016	KIM	1	Research 9th Cir cert/decert standards.
			email AG to ensure proposed Order for opposition to defendants' motion to compel
5/10/2016	ME	0.1	LinkedIn evidence was sent to Judge
5/10/2016	ME	0.1	ME/JF Question re depo digest annotations 0.1
5/10/2016	DG	0.3	dg/ms discuss need for expert as to representative sample .3
5/10/2016	ME	0.1	file named plaintiff deposition notices
5/10/2016	KIM	1.3	Research 9th Cir cert/decert standards.
			review plaintiff's discovery documents to document those that support statement of
5/10/2016	ME	1.5	facts
			MS/JF/ME review rules regarding evidence as it applies to preparing statement of facts
5/10/2016	ME	0.7	outline
5/10/2016	MS	0.3	dg/ms discuss need for expert as to representative sample .3
5/10/2016	MD	0.2	review logan groulx documents provided in powerpoint format 0.2
5/10/2016	JF	0.1	MS/JF Clarification re depo digest annotations 0.1
5/10/2016	KIM	1.5	Research 9th Cir cert/decert standards.
5/10/2016	ME	0.1	create list of priorities to work on for the week
5/10/2016	KIM	1.7	Research 9th Cir cert/decert standards.
			MS/JF/ME review rules regarding evidence as it applies to preparing statement of facts
5/10/2016	MS	0.7	outline
			MS/JF/ME review rules regarding evidence as it applies to preparing statement of facts
5/10/2016	JF	0.7	outline
5/10/2016	MR	1	md/mr discussing topics to cover during Motus deposition 1.0
5/10/2016	ME	0.1	left voicemail for named plaintiff confirming deposition date
5/10/2016	ME	0.1	prepare opt-in's document for production to defense counsel
5/10/2016	MD	1	prepare for motus deposition 1.0
5/10/2016	MD	1	md/mr discussing topics to cover during Motus deposition 1.0
			Transfer documents recd from ECF system to docket file and create file copy (Docket#381
			- SEALED DOCUMENT by Plaintiff Patty Thomas re [380] MOTION to Seal (Sweeney,
5/10/2016	CLER	0.1	Michael)
			JK review payroll history matrices to determine if there is a way to identify which
5/10/2016	JK	1.2	employees are missing MOTUS data
5/10/2016	JF	5.1	Perform depo digest of claimant's deposition 5.1
			Transfer documents recd from ECF system to docket file and create file copy (Docket#380
			- MOTION to File Under Seal re [379] Response to Motion by Plaintiff Patty Thomas.
			(Attachments: # (1) Declaration of Michael J.D. Sweeney in Support of Plaintiffs Motion to
			File Documents Under Seal, # (2) Exhibit Exhibit A Boudreau 5-9-16 Email, # (3) Proposed
5/10/2016	CLER	0.1	Order) Noting Date 5/20/2016, (Sweeney, Michael)
5/10/2016	ME	0.1	create zip file of plaintiff discovery documents to produce to defense counsel
5/10/2016	DG	0.4	legal research re sufficiency/reliability of representative testimony .4
5/10/2016	MD	0.2	email defense counsel about deposition dates of named plaintiffs 0.2
5/10/2016	ME	0.1	telephone call from opt-in for case update
5/10/2016	ME	0.2	download, file, and track defendants' discovery production
5/10/2016	ME	0.2	telephone call to court reporter to clarify letter about opt-in's deposition transcript
5/10/2016	ME	0.1	locate opt-in discovery documents requested by MD for 30b6 deposition

Date	Staff	Amount of Time	Description
5/10/2016	AG	0.1	Emailed Proposed Order to Judge as per Court rules (Docket#380 MOTION to File Under Seal re [379] Response to Motion
5/10/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#379 - RESPONSE, by Plaintiff Patty Thomas, to [373] MOTION to Compel LinkedIn Evidence. (Attachments: # (1) Exhibit 1 Volk Resume, # (2) Exhibit 2 Sweeney 4-5-16 letter, # (3) Exhibit 3 Industrial Standards Study)(Sweeney, Michael)
5/10/2016	MD	1	review documents and edit outline for motus deposition 1.0
5/10/2016	ME	0.9	prepare emails confirming deposition date, time and locations to send to named plaintiffs
5/10/2016	ME	0.1	MD/ME discuss production of plaintiff's documents
5/10/2016	ME	1.2	verify that all privilege information has been redacted from plaintiff's documents before producing to defense counsel
5/10/2016	CLER	0.1	ECF Filing of MOTION to File Under Seal re [379] Response to Motion (Attachments: # (1) Declaration of Michael J.D. Sweeney in Support of Plaintiffs Motion to File Documents Under Seal, # (2) Exhibit Exhibit A Boudreau 5-9-16 Email, # (3) Proposed Order)
5/10/2016	AG	0.4	ECF Filing of SEALED DOCUMENT re [380] MOTION to Seal (PCT ECF clerk for tech issues)
5/10/2016	AG	0.2	PCT Magna (conference call in number/name of court reporter)
5/10/2016	MD	1.5	prepare for motus depostion 1.5
5/10/2016	ME	0.6	locate specific defendant discovery document as requested by MD
5/10/2016	MD	0.1	MD/ME discuss production of plaintiff's documents
5/11/2016	ME	0.1	telephone call from court reporter regarding deposition transcript payment
5/11/2016	KIM	0.2	Discuss WD WA cert cases w/ MD.
5/11/2016	ME	2	compile discovery documents to support statement of facts
5/11/2016	MD	2	md/mr take deposition of motus ceo 2.0
5/11/2016	JF	0.3	Review response from Kellogg regarding discovery 0.3
5/11/2016	MD	0.4	prepare for motus deposition 0.4
5/11/2016	ME	1.9	compile documents to support statement of facts
5/11/2016	MR	2	md/mr take deposition of motus ceo 2.0
5/11/2016	ME	0.2	reply to opt-in's email asking for case update
5/11/2016	CLER	0.1	create PDF format of correspondence recd from D. ( response to 5.02.2016 email)
5/11/2016	ME	0.5	locate specific defendant discovery document as requested by MD for 30b6 deposition
5/11/2016	ME	0.3	telephone call from opt-in for case update .2; notes from conversation .1
5/11/2016	MD	0.4	edit motion to compel attorney client evidence 0.4
5/11/2016	MD	0.2	research MO state law re class certification 0.2
5/11/2016	MD	0.5	reviewing documents in preparatoin for dye deposition 0.5
5/11/2016	JF	3.8	Perform depo digest of claimant's testimony 3.8
5/11/2016	JF	0.3	ME/JF Review the outcomes of the meeting re statement of facts document links 0.3
5/11/2016	ME	0.1	email plaintiff deposition preparation date and time
5/11/2016	ME	0.1	email response to plaintiff's question about deposition
5/11/2016	ME	0.3	ME/JF Review the outcomes of the meeting re statement of facts document links 0.3
5/11/2016	ME	0.8	compile documents to support statement of facts
5/11/2016	KIM	1.2	Read secondary sources on (de-)/certification motions
5/12/2016	KIM	2	Review WD Wash decisions on (de-)/cert.

Date	Staff	Amount of Time	Description
5/12/2016	MD	0.2	MD/ME discuss documents needed to send to named plaintiff to review prior to deposition
5/12/2016	ME	0.7	compile discovery documents that support statement of facts for attorneys to review
5/12/2016	ME	0.2	email documents to plaintiff to review prior to deposition
5/12/2016	ME	0.4	compile documents for plaintiff to review prior to deposition
5/12/2016	JF	3.6	Perform depo digest of claimant's testimony 3.6
5/12/2016	ME	0.2	MD/ME discuss documents needed to send to named plaintiff to review prior to deposition
5/12/2016	MD	2.5	read client deposition transcript in preparation for deposition 2.5
5/12/2016	MD	2.5	prep client for deposition 2.5
5/12/2016	MD	0.5	review client documents in preparation for deposition 0.5
5/12/2016	JF	2.3	Perform depo digest of claimant's testimony 2.3
5/12/2016	ME	2	complete deposition digest for named plaintiff
5/12/2016	ME	0.6	work on deposition digest of opt-in's transcript
5/12/2016	CLER	0.4	file hard copies of deposition exhibits and misc. correspondence
5/13/2016	ME	0.2	draft email to opt-in regarding severance agreement impacts to claim for MD to review prior to sending
5/13/2016	ME	0.2	file plaintiff documents that were produced to defense counsel
5/13/2016	ME	0.3	compile documents for plaintiff's deposition folder
5/13/2016	ME	2.9	work on deposition digest for opt-in's transcript
5/13/2016	CLER	0.3	prepare mailing to client (returned of org. documents)
5/13/2016	ME	0.3	search for specific defendant discovery document as requested by MD
5/13/2016	MD	0.1	text client re deposition 0.1
5/13/2016	CLER	0.3	prepare mailing to client (returned of org. documents)
5/13/2016	ME	0.5	work on deposition digest of opt-in's transcript
5/13/2016	ME	0.8	work on deposition digest of opt-in's transcript
5/13/2016	JF	5.4	Perform depo digest of claimant's testimony 5.4
5/13/2016	ME	0.1	reply to opt-in's email about severance agreement
5/16/2016	JF	4.2	Review MGMT emails to find specific documents in preparation for the 30B6 deposition 4.2
5/16/2016	JF	0.3	Schedule a reporter for 30B6 deposition 0.3
5/16/2016	ME	0.1	file letter from defendant regarding discovery
5/16/2016	ME	0.2	download, file, and track defendants' discovery production
5/16/2016	ME	0.1	determine next deposition digest to be completed according to priority list
5/16/2016	ME	0.1	verify that outstanding discovery has not been received from defendant
5/16/2016	ME	0.2	download and save defendant's response to reply to motion to compel linkedin evidence
5/16/2016	JF	0.1	MA/JF Review stenographer booking options for depositions 0.1
5/16/2016	ME	0.7	email documents to named plaintiffs to review prior to deposition
5/16/2016	ME	0.1	MD/ME discuss documents to compile for plaintiffs' deposition folders
5/16/2016	MS	0.1	MS/JF Clarify DT Search criteria to effectively navigate supporting evidence to prepare for 30B6 deposition 0.1
5/16/2016	ME	1.1	work on deposition digest for opt-in's transcript
5/16/2016	MD	0.1	MD/ME discuss documents to compile for plaintiffs' deposition folders
5/16/2016	JF	1.2	Perform depo digest of claimant's testimony 1.2
5/16/2016	MD	0.3	prepare for call with client for deposition prep 0.3
5/16/2016	MA	0.1	MA/JF Review stenographer booking options for depositions 0.1
5/16/2016	JF	0.2	JS/JF Assist to schedule a stenographer 0.2
5/16/2016	MD	1.7	prep client for deposition 1.7

Date	Staff	Amount of Time	Description
5/16/2016	JF	0.1	Call to Magna Legal services to cancel the stenographer in Battle Creek, MI 0.1
5/16/2016	ME	1.7	compile documents needed for plaintiffs' deposition folders to prepare for upcoming depositions
5/16/2016	MS	0.2	md/ms meet re what remains to be accomplished for discovery 0.2
5/16/2016	ME	0.1	MD/ME review plaintiff's discovery document
5/16/2016	MD	3.5	review documents for 30b6 deposition and modifying outline 3.5
5/16/2016	ME	0.4	complete deposition digest for opt-in's transcript
5/16/2016	JF	0.1	MS/JF Clarify DT Search criteria to effectively navigate supporting evidence to prepare for 30B6 deposition 0.1
5/16/2016	ME	1.2	work on deposition digest of opt-in's transcript
5/16/2016	JS	0.2	JS/JF Assist to schedule a stenographer 0.2
5/16/2016	MD	0.6	review documents for patty thomas deposition prep 0.6
5/16/2016	MD	0.1	MD/ME review plaintiff's discovery document
5/16/2016	MD	0.2	md/ms meet re what remains to be accomplished for discovery 0.2
5/16/2016	ME	0.3	review discovery documents to possibly be used for 30b6 deposition
5/16/2016	MD	0.5	research 30b6 deponent and position 0.5
5/17/2016	JF	4.8	Perform depo digest of claimant's testimony 4.8
5/17/2016	ME	0.3	locate defendants' discovery document as requested by MS
5/17/2016	MS	3.1	review docs and statement of facts in prep for 30b6 depo
5/17/2016	ME	0.1	MS/ME describe discovery document to locate for 30b6 deposition
5/17/2016	MD	2.8	prep client for deposition 2.8
5/17/2016	ME	0.1	ME/JF Discuss DT Search of opt-in emails 0.1
5/17/2016	JS	0.2	JS/JF Assist with printer settings for Statement of Facts documents 0.2
5/17/2016	JF	0.1	Assist MS to print documents related to Kellogg Statement of Facts 0.1
5/17/2016	JF	0.1	ME/JF Discuss DT Search of opt-in emails 0.1
5/17/2016	MA	0.1	MA/JF Clarify the Bates-stamp process regarding plaintiff production 0.1
5/17/2016	MS	0.2	MS/MR discuss concerns of upcoming 30b6
5/17/2016	MD	2	prep client for deposition 2.0
5/17/2016	JF	0.2	JS/JF Assist with printer settings for Statement of Facts documents 0.2
5/17/2016	ME	0.1	ME/JF Question re document hyperlink 0.1
5/17/2016	ME	0.1	MD/ME discuss status of named plaintiff deposition preparations
5/17/2016	JF	0.2	Assist MS to locate a specific Bates-stamped document 0.2
5/17/2016	JF	0.2	Print a document from Statement of Facts (per attorney's request) 0.2
5/17/2016	MD	0.1	MD/ME discuss status of named plaintiff deposition preparations
5/17/2016	ME	0.1	ME/JF Locate a specific Bates-stamped document (per attorney request) 0.1
5/17/2016	ME	0.1	email deposition reminder to plaintiff
5/17/2016	ME	0.1	download and save Order granting [360] Plaintiffs' Motion to Seal Document 361
5/17/2016	ME	3.7	search defendants' discovery documents (emails) to be used as possible exhibits for the Kellogg 30b6 deposition .3.1; save files to designated folder .6
5/17/2016	MR	1	perform searches on Defendant PST production regarding Motus .3, save interesting emails to server .2, send email to team about email thread regarding Kellogg tracking of motus data .2, search case folders for motus manuals and other saved motus information .2, email to MS regarding 3 versions of motus manuals .1
5/17/2016	MR	0.2	MS/MR discuss concerns of upcoming 30b6
5/17/2016	JF	0.1	MA/JF Clarify the Bates-stamp process regarding plaintiff production 0.1
5/17/2016	ME	0.1	email deposition reminder to plaintiff
5/17/2016	ME	0.3	download, save, and track opt-in's deposition transcript .2; email deposition transcript to opt-in for review .1

Date	Staff	Amount of Time	Description
5/17/2016	ME	0.1	email deposition reminder to plaintiff
5/17/2016	JF	0.2	Assist MS to print documents related to Kellogg Statement of Facts 0.2
5/17/2016	MS	0.1	MS/ME describe discovery document to locate for 30b6 deposition
5/17/2016	JS	0.2	troubleshoot printing issue
5/17/2016	ME	0.3	work on deposition digest of opt-in's transcript
5/17/2016	MD	0.5	editing 30b6 outline 0.5
5/17/2016	JF	0.1	ME/JF Question re document hyperlink 0.1
5/17/2016	ME	0.1	email deposition reminder to plaintiff
5/17/2016	JF	0.1	ME/JF Locate a specific Bates-stamped document (per attorney request) 0.1
5/17/2016	MR	0.3	read and reply to multiple emails in thread with atty MS regarding storage of files on flash drive
5/17/2016	ME	0.3	locate bates stamp version of client doc to use for statement of facts
5/17/2016	MD	0.5	gather documents to send to client in preparation for deposition 0.5
5/17/2016	JF	0.1	Assist MS to access a hyperlinked document in the Statement of Facts 0.1
5/17/2016	MD	1.9	prep client for deposition 1.9
5/17/2016	JF	0.1	Assist MS to print documents related to Kellogg Statement of Facts 0.1
5/18/2016	ME	0.2	MD/ME review online job postings for newly created positions within Kellogg
5/18/2016	ME	0.2	download and save court Order re Extending Discovery Deadline and Briefing Schedules research information about the pay status of newly created position at Kellogg by looking
5/18/2016	ME	0.4	at notes from conversations with clients and online job positions
5/18/2016	ME	1.3	complete deposition digest of opt-in's transcript
5/18/2016	MD	5	prep clients for depositions 5.0
5/18/2016	ME	1.6	work on deposition digest of opt-in's transcript
5/18/2016	MD	0.2	MD/ME review online job postings for newly created positions within Kellogg
5/19/2016	JF	0.1	Compose an email to ME re [client] reporter certification received via fax 0.1
5/19/2016	ME	2.8	work on deposition digest of opt-in's transcript
5/19/2016	ME	0.1	respond to plaintiff's email about attire for deposition
5/19/2016	JF	0.1	Email [client]'s contact information to MD (for deposition purposes) 0.1
5/19/2016	ME	0.1	email MD details of plaintiff's deposition preparation availability
5/19/2016	MS	0.1	MS/ME discuss status of discovery data produced by defense counsel for purposes of using the data at 30b6 deposition
5/19/2016	MD	2	drive to and from deposition 2.0
5/19/2016	MS	0.3	MS/ME review defendants' discovery documents to be printed for 30b6 deposition
5/19/2016	JF	0.1	Call from claimant re case update 0.1
5/19/2016	ME	0.2	download and save defendants' discovery production .1; track production and email to litigation team .1
5/19/2016	MD	0.5	discuss deposition with clients before deposition 0.5
5/19/2016	ME	0.3	MS/ME review defendants' discovery documents to be printed for 30b6 deposition
5/19/2016	JF	0.1	Save [client]'s Reporter certification fax to my Xbox 0.1
5/19/2016	ME	0.1	MS/ME discuss status of discovery data produced by defense counsel for purposes of using the data at 30b6 deposition
5/19/2016	MS	4.7	drafting 30b6 outline, including document review and incorporation
5/19/2016	JF	0.2	Call from claimant re case update 0.2
5/19/2016	MD	1	discuss deposition results with clients after depositions 1.0
5/19/2016	ME	0.2	telephone call with plaintiff to confirm deposition date and schedule a time for deposition preparation .1; notes from conversation .1
5/19/2016	ME	0.1	email MD about court reporter certification fax regarding opt-in's deposition

Date	Staff	Amount of Time	Description
5/19/2016	JF	4.1	Perform depo digest of claimant's testimony 4.1
5/19/2016	MS	0.1	MS/ME review appropriate attire for plaintiff to wear to deposition
5/19/2016	ME	0.1	MS/ME review appropriate attire for plaintiff to wear to deposition
5/19/2016	MD	5	defend named plaintiff deposition 5.0
5/19/2016	ME	0.1	telephone call to plaintiff to confirm location of deposition
5/20/2016	ME	0.2	ME/JF Review the locations of Bates-stamped documents (paystubs) 0.2
5/20/2016	JF	0.2	Compose email to MS re paystubs 0.2
5/20/2016	ME	0.3	telephone call from opt-in about company restructure .2; notes from conversation .1
5/20/2016	JF	3.2	Perform depo digest of claimant's testimony 3.2
5/20/2016	ME	0.2	download and save Court Orders
5/20/2016	ME	0.1	MS/ME review location of discovery document to be used for 30b6 deposition
5/20/2016	MD	5	defend named plaintiff depositions 5.0
5/20/2016	ME	0.7	print exhibits in color for 30b6 deposition .4; travel to print shop .3
5/20/2016	JF	0.2	Research Bates-stamped documents for specific information (per attorney's request) 0.2 email MD about opt-in's concerns about restructure so that we can schedule meeting to
5/20/2016	ME	0.1	review speaking to clients about this
5/20/2016	MD	0.5	discuss depositions with clients before deposition 0.5
5/20/2016	ME	0.1	email MD about printing confidential documents for 30b6 deposition
5/20/2016	ME	0.3	review information from MD about documents to be used for 30b6 deposition
5/20/2016	MD	2	drive to and from deposition 2.0
5/20/2016	MS	5.7	drafting 30b6 outline and reviewing and incorporating docs
5/20/2016	ME	2.5	work on deposition digest of opt-in's transcript
5/20/2016	MD	1	discuss deposition results with clients after depositions 1.0
5/20/2016	MS	0.1	MS/ME review location of discovery document to be used for 30b6 deposition file deposition notice of plaintiff .1; compose email to plaintiff confirming date of
5/20/2016	CLER	0.3	deposition and deposition preparation .2
5/20/2016	JF	0.2	ME/JF Review the locations of Bates-stamped documents (paystubs) 0.2
5/20/2016	ME	0.7	search for possible exhibits for 30b6 deposition as requested by MS
5/20/2016	ME	0.4	print and organize exhibits for 30b6 deposition
5/23/2016	ME	0.2	ME/JF Confer re MorningFoods claimants' paystubs 0.2
5/23/2016	JF	0.2	ME/JF Confer re MorningFoods claimants' paystubs 0.2
5/23/2016	JF	4.6	Produce 3 copies of each exhibit to be potentially used in the Kellogg 30B6 deposition 4.6  download and save ORDER ON IN CAMERA re [311] MOTION to Compel and [347]
5/23/2016	ME	0.1	MOTION for Reconsideration of Order Compelling Production of Willard Bishop Study
5/23/2016	KIM	3.5	Research (de)/cert cases to see if we need more discovery. Locate specific management email for the purposes of the 30B6 deposition (RSM
5/23/2016	JF	0.3	Itineraries) 0.3 read ORDER ON IN CAMERA re [311] MOTION to Compel and [347] MOTION for
5/23/2016	ME	0.2	Reconsideration of Order Compelling Production of Willard Bishop Study
5/23/2016	ME	0.1	ME/JF Brief overview of the study concerning work time (the Willard-Bishop study) 0.1 MS/ME organize potential exhibits for 30b6 deposition to correspond with deposition
5/23/2016	MS	1.1	outline
5/23/2016	ME	0.1	MD/ME discuss organization of potential 30b6 exhibits
5/23/2016	MD	0.1	MD/ME discuss organization of potential 30b6 exhibits



Date	Staff	Amount of Time	Description
5/23/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#382 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company, TO RESPONSE to [373] MOTION to Compel LinkedIn Evidence (Attachments: # (1) Exhibit A, # (2) Exhibit B)(Nelson, James)
5/23/2016	JF	0.2	Call to TSG to inquire about the court reporter (name/time change) 0.2
5/23/2016	MR	4.9	perform multiple tasks related to Kellogg preparation for 30b6 (resync case folders to laptop multiple times, create three CDs of exhibits 2.0, match-up names and dates of original Motus data with that of newer Motus data 2.5, collect ESI 30b6 transcript excerpts and send them to attys MS and MD .4,
5/23/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#388 - ORDER ON IN CAMERA re [311] MOTION to Compel and [347] MOTION for Reconsideration of Order Compelling Production of Willard Bishop Study; signed by Judge Ronald B. Leighton. (DN)
5/23/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#387 - ORDER granting [380] Plaintiffs' Motion to Seal Exhibit 3 [Dkt. #379] to Plaintiffs' Opposition to Defendants' Motion to Compel LinkedIn Evidence; signed by Judge Ronald B. Leighton.(DN)
5/23/2016	ME	6.8	prepare potential exhibits for 30b6 deposition by labeling and organizing documents
5/23/2016	KIM	3	Research (de)/cert cases to see if we need more discovery.
5/23/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#384 - ORDER on STIPULATION [378] re extension: Fact Discovery Deadline is 5/30/16, only discovery requested and depositions noticed prior to 5/2/16 will be pursued after 5/2/16, Dispositive motions due by 7/1/2016; signed by Judge Ronald B. Leighton. (DN)
5/23/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#383 - ORDER granting [360] Plaintiffs' Motion to Seal Document 361; signed by Judge Ronald B. Leighton.(DN)
5/23/2016	JS	1.7	assist with printing and collating 30(b)(6) deposition exhibits
5/23/2016	ME	0.2	organize exhibits for 30b6 deposition
5/23/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#386 - ORDER denying [373] Defendants Motion to Compel LinkedIn Evidence; signed by Judge Ronald B. Leighton.(DN)
5/23/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#385 - ORDER denying [363] Defendants' Motion to Compel Responses to Interrogatories; signed by Judge Ronald B. Leighton.(DN)
5/23/2016	MR	3	combine the new production Motus datasets 1.1, perform date comparison of older Motus production to newer production datasets 1.4, examine date comparison for discrepancies .5
5/23/2016	ME	0.5	make copies of potential exhibits for 30b6 deposition
5/23/2016	JF	0.2	Locate the RSR workload model document for the purposes of the deposition 0.2
5/23/2016	MS	3	travel to Philadelphia for 30b6 deposition 3.0
5/23/2016	ME	0.4	print color copies of potential exhibits for 30b6 deposition .2; travel to and from print shop .2
5/23/2016	MR	0.1	MS/MR via phone about folder organization of exhibits .1
5/23/2016	ME	0.3	work on deposition digest of opt-in's transcript
5/23/2016	MD	6	prepare for 30b6 deposition 6.0
5/23/2016	JF	0.6	Find examples of MorningFoods claimants' paystubs for the purposes of the 30B6 deposition 0.6

Date	Staff	Amount of Time	Description
5/23/2016	JF	0.1	ME/JF Brief overview of the study concerning work time (the Willard-Bishop study) 0.1
5/23/2016	ME	1.1	MS/ME organize potential exhibits for 30b6 deposition to correspond with deposition outline
5/23/2016	JF	0.3	Compile all the exhibits into an Exhibit folder for the purposes of the 30B6 deposition 0.3
5/23/2016	JF	0.1	Confirm the court reporter for the upcoming 30B6 deposition 0.1
5/23/2016	MS	0.1	MS/MR via phone about folder organization of exhibits .1
5/23/2016	JF	0.2	Confirm the court reporter for the 30B6 deposition 0.2
5/23/2016	ME	0.4	print documents for 30b6 deposition
5/23/2016	MD	3	travel to Philadelphia for 30b6 deposition 3.0
5/24/2016	MS	8	take Kellogg 30b6 deposition 8.0
5/24/2016	ME	0.1	save plaintiff's electronic discovery document
5/24/2016	ME	2.5	work on deposition digest of opt-in's transcript
5/24/2016	JF	0.2	Confirm the Court Reporter for the second day of the 30B6 deposition 0.2
5/24/2016	ME	0.1	send email to plaintiff with update deposition time
5/24/2016	ME	0.1	send email to plaintiff regarding discovery document
5/24/2016	MD	8	take Kellogg 30b6 deposition 8.0
5/24/2016	JF	0.2	Call to confirm deposition time with the claimant in the case 0.2
5/24/2016	CLER	0.3	file hard copies of deposition exhibits that MS was reviewing to prepare for 30b6 deposition
5/25/2016	ME	0.1	send plaintiff's discovery document to defense counsel
5/25/2016	ME	0.3	work on deposition digest of opt-in's transcript
5/25/2016	ME	0.2	prepare plaintiff's document for production to defense counsel by reviewing and bates stamping
5/25/2016	ME	0.3	search for discovery documents as requested by MD for 30b6 deposition
5/25/2016	JF	0.3	Attempt to locate documents for the purposes of the 30B6 deposition 0.3
5/25/2016	JF	3.6	Perform digest of claimant's depo 3.6
5/25/2016	ME	1.4	search for and send documents requested by MD for 30b6 deposition
5/25/2016	ME	1.7	work on deposition digest of opt-in's transcript
5/25/2016	ME	0.4	work on deposition digest of opt-in's transcript
5/25/2016	MD	9	take 30b6 deposition 9.0
5/25/2016	MS	4	return travel from Kellogg 30b6 depositions (Philadelphia to New Paltz) 4.0
5/25/2016	MD	4	return travel from Kellogg 30b6 depositions (Philadelphia to New Paltz) 4.0
5/25/2016	MS	9	take 30b6 deposition 9.0
5/26/2016	ME	0.3	debrief re outcome of 30b6 deposition
5/26/2016	MS	0.3	debrief re outcome of 30b6 deposition
5/26/2016	ME	0.1	reply to opt-in's email requesting case update
5/26/2016	JF	0.1	MS/JF Review briefly the outcomes of the 30B6 deposition 0.1
5/26/2016	MD	2	defend deposition of named plaintiff 2.0
5/26/2016	ME	0.7	work on deposition digest of opt-in's transcript
5/26/2016	ME	0.1	email MD about plaintiff's deposition
5/26/2016	ME	0.4	search for defendant production of plaintiff deposition exhibits as per MD
5/26/2016	ME	0.2	review if plaintiff's document was produced prior to his last deposition as requested by MD
5/26/2016	ME	0.3	complete deposition digest of opt-in's transcript
5/26/2016	ME	0.1	send deposition reminder to plaintiff
5/26/2016	ME	0.2	review priority list to determine which deposition transcript should be digested next
5/26/2016	JF	0.1	ME/JF Brief review of the outcomes of the 30B6 deposition (per MS) 0.1

Date	Staff	Amount of Time	Description
5/26/2016	ME	0.4	work on deposition digets of opt-in's transcript
5/26/2016	MD	0.2	call with client about deposition 0.2
5/26/2016	MS	0.1	MS/JF Review briefly the outcomes of the 30B6 deposition 0.1
5/26/2016	CLER	0.1	create PDF format of correspondence recd from unknown (RSR new structure)
5/26/2016	MD	2.1	defend soliman sayedi depositions 2.1
5/26/2016	ME	0.1	ME/JF Brief review of the outcomes of the 30B6 deposition (per MS) 0.1
5/26/2016	ME	1.3	work on deposition digest of opt-in's transcript
5/27/2016	MD	2.5	prepare questions for Motus representative and send to Motus attorneys 2.5
5/27/2016	MD	0.5	MD/MR review Powell depo for issues for which he said he would follow up
5/27/2016	MR	0.5	MD/MR review Powell depo for issues for which he said he would follow up
5/27/2016	JF	0.2	JF/MR briefly discuss some parts of Willard Bishop study
5/27/2016	MR	0.2	JF/MR briefly discuss some parts of Willard Bishop study
5/27/2016	MR	0.1	email to MD and team asking about Willard Bishop study
5/27/2016	JF	0.8	Review the recently acquired Willard-Bishop study documents 0.8
5/27/2016	MR	0.1	MD/MR discuss draft of email to Motus attorney
5/27/2016	MR	0.5	examine some sections of Willard Bishop report
			work on motus information: create spreadsheet and lookup tables to list the opt-ins who worked in 2013 or later not included in Motus data 1.6, modify spreadsheet to obtain number of opt-ins who worked in 4/2012 or later not included in Motus data .4, web research regarding Motus' capability and usage for tracking time of mobile workers .6,
5/27/2016	MR	2.8	write multiple emails to atty MD with regard to Motus info .2
5/27/2016	MD	0.1	MD/MR discuss draft of email to Motus attorney
5/27/2016	KIM	0.5	MS & KW meet to discuss arguments for next filings.
5/27/2016	MR	0.2	follow-up work on Motus info
5/27/2016	MS	0.5	MS & KW meet to discuss arguments for next filings.
5/31/2016	MS	2.1	draft fact section for initial briefing
5/31/2016	ME	0.1	schedule team meeting
5/31/2016	ME	0.2	review list of priority tasks to complete
5/31/2016	ME	2.7	complete deposition digest of opt-in's transcript
5/31/2016	ME	0.1	email location of opt-in rog responses to MS
5/31/2016	ME	0.3	review plaintiff's deposition transcript
5/31/2016	MS	1.1	tc w/ ET re claims, briefing, and argument
			save plaintiff's deposition transcript .1; email deposition transcript to plaintiff for review
5/31/2016	ME	0.2	.1
5/31/2016	ME	0.1	email deposition digest outline to MS for review
5/31/2016	MD	0.2	MD/ME discuss responding to clients' concerns about hours worked with restructure
5/31/2016	ME	0.1	review opt-in production to verify production of specific document
5/31/2016	ME	0.1	left voicemail for opt-in to follow up with concerns about restructure
5/31/2016	ME	0.2	MD/ME discuss responding to clients' concerns about hours worked with restructure
			KIM/MD/MS/JF/MR/ME meet to provide update regarding 30b6 deposition .2; review argument for summary judgement .5; discuss tasks needed to complete by attorneys and
5/31/2016	ME	1.5	paralegals for summary judgement and class certification .8
			KIM/MD/MS/JF/MR/ME meet to provide update regarding 30b6 deposition .2; review argument for summary judgement .5; discuss tasks needed to complete by attorneys and
5/31/2016	MR	1.5	paralegals for summary judgement and class certification .8

Date	Staff	Amount of Time	Description
5/31/2016	JF	1.5	KIM/MD/MS/JF/MR/ME meet to provide update regarding 30b6 deposition .2; review argument for summary judgement .5; discuss tasks needed to complete by attorneys and paralegals for summary judgement and class certification .8
5/31/2016	MD	1.5	KIM/MD/MS/JF/MR/ME meet to provide update regarding 30b6 deposition .2; review argument for summary judgement .5; discuss tasks needed to complete by attorneys and paralegals for summary judgement and class certification .8
5/31/2016	MS	1.5	KIM/MD/MS/JF/MR/ME meet to provide update regarding 30b6 deposition .2; review argument for summary judgement .5; discuss tasks needed to complete by attorneys and paralegals for summary judgement and class certification .8
5/31/2016	KIM	1.5	KIM/MD/MS/JF/MR/ME meet to provide update regarding 30b6 deposition .2; review argument for summary judgement .5; discuss tasks needed to complete by attorneys and paralegals for summary judgement and class certification .8
5/31/2016	ME	0.1	save transcript from Motus 30b6 deposition
5/31/2016	ME	0.3	draft and send emails to MD about client concerns
5/31/2016	JF	2.3	Perform depo digest of claimant's testimony 2.3
5/31/2016	ME	0.2	JF/ME discuss best location within the deposition outline for particular testimony
5/31/2016	JF	0.2	JF/ME discuss best location within the deposition outline for particular testimony
6/1/2016	JF	4.8	Perform a depo digest of plaintiff's testimony 4.8
6/1/2016	KIM	0.3	Begin contract research for MSJ
6/1/2016	MD	4.5	drafting primary job duty section for summary judgment 4.5
6/1/2016	ME	0.3	telephone call with opt-in for case update .2; notes from conversation .1
6/1/2016	ME	1.2	complete deposition digest of opt-in's transcript
6/1/2016	MS	0.2	MS/ME discuss locating opt-in answer to interrogatories in excel format .1; discuss deposition digest outline
6/1/2016	ME	1.5	work on deposition digest of opt-in's transcript
6/1/2016	MR	0.1	MR/JF Review the concept of "profit margin" (for the pruposes of depo digests) 0.1
6/1/2016	ME	0.1	listen to voicemail from opt-in requesting case update
6/1/2016	MR	0.2	MR/ME discuss location of answer to interrogatories responses in excel format
6/1/2016	ME	0.2	MR/ME discuss location of answer to interrogatories responses in excel format
6/1/2016	ME	0.2	MS/ME discuss locating opt-in answer to interrogatories in excel format .1; discuss deposition digest outline
6/1/2016	JF	0.1	MR/JF Review the concept of "profit margin" (for the pruposes of depo digests) 0.1
6/1/2016	ME	2.5	work on deposition digest of opt-in's transcript
6/1/2016	KIM	0.3	ms/kw discuss research on contract sj issue and class cert standards
6/1/2016	MR	0.1	read and reply to multiple email exchanges with para ME about need for interrog spreadsheets
6/1/2016	MS	0.3	ms/kw discuss research on contract sj issue and class cert standards
6/1/2016	ME	0.2	telephone call from opt-in regarding update
6/2/2016	KIM	2.7	Contract research for MSJ
6/2/2016	KIM	0.6	Contract research for MSJ
6/2/2016	MR	0.3	examine the complicated mail merge folder containing the interrogatory excel sheet in preparation for working on compiling them for atty MS
6/2/2016	JF	5.4	Perform depo digest of claimant's testimony 5.4
6/2/2016	ME	0.1	ME/JF Review the process to keep track of completed deposition digests 0.1
6/2/2016	ME	2.7	work on deposition digest of opt-in's transcript
6/2/2016	MR	0.1	ME/MR confer on rog spreadsheet data needed by atty MS

Date	Staff	Amount of Time	Description
6/2/2016	JF	0.1	ME/JF Review the process to keep track of completed deposition digests 0.1
6/2/2016	ME	0.9	complete deposition digest of opt-in's transcript
6/2/2016	ME	0.1	ME/MR confer on rog spreadsheet data needed by atty MS
6/2/2016	ME	1.3	work on deposition digest of opt-in's transcript
6/3/2016	MS	0.7	time study analysis
6/3/2016	ME	1.1	complete deposition digest of opt-in's transcript 1.0; track completion .1
6/3/2016	MS	0.5	drafting narrative for primary duty most important duty section
6/3/2016	MS	0.7	drafting narrative for requirements contract section
6/3/2016	MS	1.1	drafting narrative for requirements primary duty time spent on non-exempt work section
6/3/2016	KIM	0.3	Research for MSJ
6/3/2016	ME	1.4	work on deposition digest of opt-in's transcript
6/3/2016	KIM	2.1	Research for MSJ
6/3/2016	JF	0.3	Call from a claimant re case update 0.3
6/3/2016	JF	5.8	Perform depo digest of claimant's testimony 5.8
6/3/2016	ME	0.1	verify whether or not opt-in was on list of discovery non-responders
6/3/2016	MD	0.8	ms/md/kw discussing legal arguments for summary judgment 0.8
6/3/2016	MS	0.8	ms/md/kw discussing legal arguments for summary judgment 0.8
6/3/2016	MD	0.8	ms/md/kw discussing legal arguments for summary judgment 0.8
6/3/2016	KIM	0.8	ms/md/kw discussing legal arguments for summary judgment 0.8
6/3/2016	MS	0.2	MS/ME discuss status of summary judgement brief
6/3/2016	ME	0.2	MS/ME discuss status of summary judgement brief
6/3/2016	KIM	2.6	Research for MSJ
6/3/2016	ME	2.3	complete deposition digest of opt-in's transcript 2.2; track completion .1
6/3/2016	ME	1.3	work on deposition digest of opt-in's transcript
			compile all rog spreadsheets into one sheet for review 2.1, sort by last name .1, create duplicate indicator .4, make numerous changes in sheet to simplify .3, copy to server .1,
6/5/2016	MR	3.1	email team about sheet .1
6/6/2016	JF	0.2	Call from claimant re the case update 0.2
6/6/2016	MD	0.5	md/ms discussing legal arguments for summary judgment brief 0.5
6/6/2016	MS	0.5	md/ms discussing legal arguments for summary judgment brief 0.5
			Transfer documents recd from EMAIL system to docket file and create file copy (FINAL ASCII from the 5-24-2016 deposition of Mr. Holton. attached is a complimentary printable, readable compressed PDF version with a word index, as well as a full-sized PDF
6/6/2016	CLER	0.2	and an E-Transcript version of the Transcript.)
6/6/2016	MS	0.4	review draft of primary duty argument
6/6/2016	KIM	1.5	Sales K research for MSJ
6/6/2016	KIM	0.9	Sales K research for MSJ
6/6/2016	MS	1.2	drafting section on non-exempt nature of RSR duties including legal research
6/6/2016	JF	0.1	AG/JF Review the folder location for 30B6 deposition transcript 0.1
6/6/2016	MD	6	draft legal argument re primary job duty analysis 6.0
6/6/2016	MS	0.5	drafting outline of legal argument including revised sections
6/6/2016	MS	1.1	adding section on essential duties to primary duty analysis
6/6/2016	MS	0.8	drafting job duties section based on analysis of LG and WB studies
6/6/2016	MS	0.9	drafting inventory is not sales section of argument
6/6/2016	JF	0.1	Send email to the K Team re the 30B6 deposition transcript 0.1
6/6/2016	AG	0.1	AG/JF Review the folder location for 30B6 deposition transcript 0.1
6/6/2016	MS	1.1	drafting general comments on primary duty and remaining arguments
6/6/2016	KIM	1	Sales K research for MSJ
6/6/2016	MS	1.3	redline comments on primary duty section

Date	Staff	Amount of Time	Description
6/6/2016	KIM	2.3	Write up sales K research for MSJ
6/6/2016	JF	5.2	Perform depo digest of claimant's testimony 5.2
6/6/2016	KIM	1.1	Sales K research for MSJ
			Transfer documents recd from EMAIL system to docket file and create file copy (FINAL ASCII from the 5-25-2016 deposition of Mr. Holton. Attached is a complimentary printable, readable compressed PDF version with a word index, as well as a full-sized PDF
6/7/2016	CLER	0.1	and an E-Transcript version of the transcript)
6/7/2016	ME	2.9	work on deposition digest of opt-in's transcript
6/7/2016	JF	0.1	ME/JF Confer about the new direction re composition of SJ (attorney follow-up) 0.1
			KIM/MD/MS/JF/ME provide feedback about outside sales exemption argument based on
6/7/2016	ME	0.4	facts of case for first draft of summary judgement motion
6/7/2016	KIM	1.5	Finish write-up of sales K research for MSJ
6/7/2016	ME	0.1	reply to opt-in's email about case update
6/7/2016	ME	0.1	listen to voicemail from opt-in asking for case update
6/7/2016	ME	0.1	JF/ME discuss completion status of plaintiff deposition digests
6/7/2016	JF	0.1	JF/ME discuss completion status of plaintiff deposition digests
6/7/2016	MD	2	draft legal argument re primary job duty analysis 2.0
6/7/2016	ME	1	complete deposition digest of opt-in's transcript
6/7/2016	ME	0.2	work on deposition digest of opt-in's transcript
6/7/2016	JF	0.3	Compose case update for para/attorney review (website, excel spreadsheet) 0.3
6/7/2016	ME	0.1	return telephone call to opt-in regarding case update
			KIM/MD/MS/JF/ME provide feedback about outside sales exemption argument based on
6/7/2016	JF	0.4	facts of case for first draft of summary judgement motion
6/7/2016	MS	1.6	drafting section on promotional work not sales
6/7/2016	KIM	0.7	MS & KW meet to discuss sales contract argument portion of MSJ
6/7/2016	ME	0.1	JF/ME discuss process for developing case update for clients
6/7/2016	ME	0.3	work on draft case update
6/7/2016	JF	0.1	JF/ME discuss process for developing case update for clients
			MS/ME/JF Review of facts for Summary Judgment Composition 0.7 Review of paralegal
6/7/2016	JF	0.9	responsibilities re depo digests 0.2 Total time: 0.9
6/7/2016	ME	0.1	ME/JF Confer about the new direction re composition of SJ (attorney follow-up) 0.1
6/7/2016	JF	0.1	KIM/JF Discuss the new direction in the SJ draft composition 0.1
6/7/2016	MS	0.7	MS & KW meet to discuss sales contract argument portion of MSJ
6/7/2016	KIM	0.1	KIM/JF Discuss the new direction in the SJ draft composition 0.1
6/7/2016	MS	1.4	redraft most important duty section of primary duty argument
6/7/2016	MS	0.3	review and draft comments on contract analysis
			MS/ME/JF Review of facts for Summary Judgment Composition 0.7 Review of paralegal
6/7/2016	MS	0.9	responsibilities re depo digests 0.2 Total time: 0.9
6/7/2016	MS	0.7	revise argument structure to new approach
6/7/2016	KIM	0.4	Work on sales K portion of MSJ draft
6/7/2016	MS	0.8	drafting section on inventory as non-sales
			KIM/MD/MS/JF/ME provide feedback about outside sales exemption argument based on
6/7/2016	KIM	0.4	facts of case for first draft of summary judgement motion
			KIM/MD/MS/JF/ME provide feedback about outside sales exemption argument based on
6/7/2016	MD	0.4	facts of case for first draft of summary judgement motion
			KIM/MD/MS/JF/ME provide feedback about outside sales exemption argument based on
6/7/2016	MS	0.4	facts of case for first draft of summary judgement motion



Date	Staff	Amount of Time	Description
6/7/2016	MR	0.2	read and reply to JP email about damages or RSM opt-ins
			MS/ME/JF Review of facts for Summary Judgment Composition 0.7 Review of paralegal
6/7/2016	ME	0.9	responsibilities re depo digests 0.2 Total time: 0.9
6/10/2016	MD	0.3	ms/md discuss strategy for responding to lodged order
6/10/2016	MS	0.3	ms/md discuss strategy for responding to lodged order
6/10/2016	MS	0.2	review Kellogg filing of lodged order
			review filings on dismissal of opt-ins to develop strategy to respond to Kellogg's lodged
6/10/2016	MS	0.5	order
6/10/2016	ME	0.1	MS/ME discuss location of exhibits from 30b6 deposition
6/10/2016	KIM	1.8	Work on MSJ arguments
6/10/2016	KIM	0.7	ms/md/kw conf re way forward on sj and class cert briefing
			MD/ME review status of deposition digests .1; discuss contacting opt-ins on joint notice
6/10/2016	MD	0.2	of non-response to discovery .1
6/10/2016	MD	0.7	ms/md/kw conf re way forward on sj and class cert briefing
6/10/2016	JP	0.1	JP/ME discuss status of plaintiffs with RSM job title
6/10/2016	MS	0.7	ms/md/kw conf re way forward on sj and class cert briefing
			MD/ME review status of deposition digests .1; discuss contacting opt-ins on joint notice
6/10/2016	ME	0.2	of non-response to discovery .1
6/10/2016	MS	0.2	review Kellogg filing for additional briefing pages
6/10/2016	MS	0.1	MS/ME discuss location of exhibits from 30b6 deposition
6/10/2016	ME	0.1	schedule litigation team meeting
6/10/2016	MD	2.5	editing motion to respond to kellogg's motion to dismiss plaintiffs 2.5
6/10/2016	CLER	0.7	create PDF format of exhibits (Holton deposition exhibits)
			Transfer documents recd from ECF system to docket file and create file copy (Document#390 - NOTICE of Lodging of Proposed Order of Dismissal of Non-Responding Plaintiffs Pursuant to the January 20, 2016 Order re [338] Order on Motion for Discovery ; filed by Defendants Kellogg Company, Kellogg Sales Company. (Attachments: # (1)
6/10/2016	CLER	0.1	Proposed Order)(Nelson, James)
6/10/2016	MS	0.2	respond to JP email re RSMs
			Transfer documents recd from ECF system to docket file and create file copy (Document#389 - MOTION for Leave to File Multiple Motions for Summary Judgment, or in the Alternative, for Leave to Exceed the Page Limits for a Single Motion by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1)
6/10/2016	CLER	0.1	Proposed Order) Noting Date 6/8/2016, (Nelson, James)
6/10/2016	MS	0.3	review and respond to ET comments on draft
6/10/2016	ME	0.2	telephone call from opt-in for case update
6/10/2016	MA	1.5	beginning to create depoistion digest to assist attorneys in laying out case argument
6/10/2016	MS	1.1	research on agency treatment of OS exemption
6/10/2016	ME	1.4	work on deposition digest of opt-in's transcript
6/10/2016	ME	0.1	JP/ME discuss status of plaintiffs with RSM job title
			ME/MA review deposition digesting procedure so that MA can assist in digesting
6/10/2016	ME	0.5	depositions
6/10/2016	KIM	0.5	Work on MSJ arguments
6/10/2016	MS	0.5	review docs and Holton exhibitsforK w review for class cert research
			ME/MA review deposition digesting procedure sot hat MA can assist in digesting
6/10/2016	MA	0.5	depositions
6/13/2016	MD	6	editing fact section for outside sales agreement 6.0
6/13/2016	MR	0.4	investigate where missing KSTARS data is located .4

Date	Staff	Amount of Time	Description
6/13/2016	ME	0.2	resave data payroll produced by defendants
6/13/2016	MR	0.2	MR/ME discuss the location of payroll data produced by defendants
6/13/2016	ME	0.1	JF/ME review process for updating deposition digest tracking spreadsheet to include division where each opt-in worked
6/13/2016	MA	1	MD/MS/JF/MA/ME review outline of argument for summary judgement motion as it informs the type of testimony to focus on documenting while performing deposition digests of plaintiff deposition transcripts
6/13/2016	JF	1	MD/MS/JF/MA/ME review outline of argument for summary judgement motion as it informs the type of testimony to focus on documenting while performing deposition digests of plaintiff deposition transcripts
6/13/2016	MS	1	MD/MS/JF/MA/ME review outline of argument for summary judgement motion as it informs the type of testimony to focus on documenting while performing deposition digests of plaintiff deposition transcripts
6/13/2016	ME	0.2	insert dates into draft of case update
6/13/2016	MR	0.5	examine KSTARS data .2, examine Defendant TSR/PTM pay info .3
6/13/2016	JF	0.1	ME/JF Clarify the titles/positions at Kellogg (Snacks vs MF) to better execute depo digests
6/13/2016	JF	0.1	0.1
6/13/2016	JF	0.1	Edit case update (after ME's edits) 0.1
6/13/2016	MD	1	MD/MS/JF/MA/ME review outline of argument for summary judgement motion as it informs the type of testimony to focus on documenting while performing deposition digests of plaintiff deposition transcripts
6/13/2016	ME	0.2	MR/ME discuss the location of payroll data produced by defendants
6/13/2016	ME	0.2	send final emails to opt-ins about discovery .1; document undeliverable emails .1
6/13/2016	ME	0.1	email AG about location of 30b6 deposition exhibits
6/13/2016	ME	0.5	draft emails to opt-ins who have not completed discovery to inform them about Kellogg's notice of Lodging of non responding plaintiffs
6/13/2016	JF	0.2	Update Kellogg depo digest spreadsheet with plaintiffs whose digest were completed 0.2
6/13/2016	ME	0.1	email case update to MS for review
6/13/2016	KIM	1.5	Work on collective action certification
6/13/2016	CLER	0.1	file hard copies of 30b6 deposition transcript
6/13/2016	MR	2.1	initial work comparing overall RSR wage rate to TSR wage rate 2.1
6/13/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Document#391 - ORDER granting [389] Defendants' Motion for Leave to file an over-length brief of up to 65 pages; signed by Judge Ronald B. Leighton.(DN)
6/13/2016	KIM	1.2	Work on collective action certification
6/13/2016	JF	0.1	ME/JF Confer via phone re case update 0.1
6/13/2016	ME	0.1	ME/JF Confer via phone re case update 0.1
6/13/2016	ME	0.7	finish drafting case update to send to attorney for review
6/13/2016	MA	4.6	completing deposition digest for client's deposition in order to assist attorneys in preparation for summary judgment
6/13/2016	ME	0.1	send link to MA to transcript for digesting
6/13/2016	JF	4.4	Perform depo digest of claimant's deposition 4.4
6/13/2016	MR	0.5	pull RSR/TM pay rates from damages in preparation for project of RSR hrs compared TSR hrs
6/13/2016	ME	0.2	review deposition digest completed by paralegal assisting with the task to provide feedback
6/13/2016	JF	0.6	Research the RSR Workload Model document for attorney review (per MS) 0.6

Date	Staff	Amount of Time	Description
6/13/2016	ME	0.1	ME/JF Clarify the titles/positions at Kellogg (Snacks vs MF) to better execute depo digests
6/13/2016	ME	0.9	prepare list of opt-in's to send final email about responding discovery
6/13/2016	ME	0.2	make final edits to draft of case update .1; email to MD for review .1
6/13/2016	MR	0.1	read and reply to MD email about PTM/TSR analysis
6/13/2016	ME	0.3	work on deposition digest of opt-in's transcript to assist attorneys with summary judgement motion
6/13/2016	ME	0.1	save electronic copy of client correspondence
6/13/2016	MR	0.3	MR/ME review location of discovery data produced by defendants .2; discuss setting up DT search for deposition transcripts .1
6/13/2016	ME	0.1	file electronic copies of 30b6 deposition exhibits
6/13/2016	ME	0.3	MR/ME review location of discovery data produced by defendants .2; discuss setting up DT search for deposition transcripts .1
6/13/2016	ME	1	MD/MS/JF/MA/ME review outline of argument for summary judgement motion as it informs the type of testimony to focus on documenting while performing deposition digests of plaintiff deposition transcripts
6/14/2016	ME	0.2	save electronic copy of plaintiff's transcript .1; email transcript to plaintiff for review .1
6/14/2016	MD	0.1	MD/ME discuss process for following up with opt-ins who just responded to Kellogg's discovery request
6/14/2016	MA	3	digesting client's deposition to assist attorneys in creating statement of facts for summary judgment
6/14/2016	JF	0.9	Search through depositions for specific information re hours worked 0.9
6/14/2016	ME	0.1	MD/ME discuss process for following up with opt-ins who just responded to Kellogg's discovery request
6/14/2016	ME	0.1	reply to opt-in's email about case update
6/14/2016	MA	0.2	MA/ME review process for posting case update to website with link to Court Order
6/14/2016	ME	0.2	MA/ME review process for posting case update to website with link to Court Order
6/14/2016	KIM	0.8	Write up contracts research/points in SJ brief outline.
6/14/2016	ME	0.1	email rog to opt-in for review
6/14/2016	ME	0.2	review compilation of opt-in rog responses in excel format
6/14/2016	JF	4.3	Perform depo digest of claimant's deposition 4.3
6/14/2016	ME	0.2	check [questionnaire] for new responses to [questions] for answer to interrogatories
6/14/2016	ME	0.4	post case update to website .3; save copy of update in designated folder .1
6/14/2016	ME	3.7	work on deposition digest of opt-in's transcript to assist attorneys with summary judgment
6/14/2016	MR	2.5	work on revising wage comparison work using correct method of regular wage calculation
6/14/2016	ME	0.2	MS/JF/ME delegate to paralegals task of preparing a compilation of client testimony of hours worked
6/14/2016	KIM	2.3	Draft outline certification brief
6/14/2016	ME	0.4	review opt-in's answer to interrogatories to compile testimony about hours worked to assist attorneys with summary judgment
6/14/2016	ME	0.1	reply to opt-in's email about discovery documents
6/14/2016	ME	0.3	[compile] and save new [questions] response for answer to interrogatories .2; convert file to word for ease of creating Answer to Interrogatories from [questions] responses .1

Date	Staff	Amount of Time	Description
6/14/2016	ME	0.3	create Answer to Interrogatories for opt-in based on his [questions] responses
			search defendant production for document requested by MD for use in summary
6/14/2016	ME	0.2	judgement motion
6/14/2016	ME	0.2	telephone call from opt-in about rog
6/14/2016	KIM	1.1	Finish first draft outline of certification brief
6/14/2016	MD	7	editing outside sales sj fact section 7.0
			MS/JF/ME delegate to paralegals task of preparing a compliation of client testimony of
6/14/2016	JF	0.2	hours worked
6/14/2016	ME	0.1	telephone call to opt-in to follow up about [questions] for rog
			MS/JF/ME delegate to paralegals task of preparing a compliation of client testimony of
6/14/2016	MS	0.2	hours worked
6/14/2016	ME	0.1	left voicemail for opt-in to follow up about [questions] for rog
6/14/2016	ME	0.1	send opt-in transcript to MA for digesting
6/14/2016	KIM	2.7	Draft outline certification brief
6/14/2016	KIM	0.7	Review contracts research for SJ brief
6/15/2016	MS	0.5	MS/ME describe purpose of 56.1 statement and process for creating it
6/15/2016	ME	0.2	JF/ME discuss status project to compile testimony about hours plaintiffs worked
6/15/2016	KIM	1.1	MS KW meet to discuss outline of cert brief.
			send detailed email to MS and team regarding revised approach to calculating the regular
6/15/2016	MR	0.2	rate for comparison to TSR wages .2
6/15/2016	JF	0.2	JF/ME discuss status project to compile testimony about hours plaintiffs worked
6/15/2016	MD	3	reviewing and editing legal argument 3.0
6/15/2016	KIM	0.8	Work on cert draft outline
6/15/2016	ME	0.3	MS/ME explain testimony about hours worked that can be used as evidence
6/15/2016	MR	0.1	MS/MR discuss strategy and needs for SJ hours arguments
6/15/2016	ME	4.9	compile data about the hours plaintiffs worked from rog testimony
6/15/2016	MS	0.1	MS/MR discuss strategy and needs for SJ hours arguments
6/15/2016	ME	0.1	check [questionnaire] for new responses to [questions] for answer to interrogatories
6/15/2016	KIM	1	Kellogg review SJ argument
6/15/2016	KIM	0.9	Kellogg addtnl research for SJ argument
6/15/2016	JF	2.4	Compile testimony (depositions) re hours worked for SJ 2.4
6/15/2016	JF	0.1	Call from a claimant re case update 0.1
			read and reply multiple times in email thread regarding plaintiff who has detailed time
6/15/2016	MR	0.2	logs .2
6/15/2016	MS	1.1	MS KW meet to discuss outline of cert brief.
6/15/2016	MS	0.3	MS/ME explain testimony about hours worked that can be used as evidence
6/15/2016	MD	1.5	editing fact section for summary judgment on the outside sales exemption 1.5
6/15/2016	ME	0.5	MS/ME describe purpose of 56.1 statement and process for creating it
6/15/2016	ME	0.2	MR/ME review project for compiling hours plaintiffs worked according to rogs
6/15/2016	KIM	2.7	Research facts for cert brief (1.3) work on cert brief outline (1.4)
6/15/2016	ME	0.1	send email to opt-in about [questions] for answer to interrogatories
6/15/2016	MR	0.2	MR/ME review project for compiling hours plaintiffs worked according to rogs
6/16/2016	ME	1.8	compile data about hours plaintiffs worked from answer to interrogatories responses
6/16/2016	JF	0.2	ms/jf discuss proper citation for depo testimony
			download and save new [questions] responses for answer to interrogatories .1; create
6/16/2016	ME	0.5	answer to interrogatories for opt-ins based on [questions] responses

Date	Staff	Amount of Time	Description
6/16/2016	KIM	1	Work on certification outline
6/16/2016	MS	0.2	ms/jf discuss proper citation for depo testimony
6/16/2016	MS	0.1	email to kw re UCC section on custom and practice
6/16/2016	MR	0.2	email ME about Kellogg hours project .1, read ME reply .1
6/16/2016	ME	0.8	compile list of hours worked and citations from plaintiff declarations for use in summary judgment
6/16/2016	JF	6.2	Compile testimony (depositions) re hours worked for SJ 6.2
6/16/2016	KIM	2.5	Work on certification outline
6/16/2016	MS	1.2	review and comment on draft fact section
6/16/2016	MD	1	editing fact section 1.0
6/16/2016	ME	0.1	check [questionnaire] for new responses to [questions] for answer to interrogatories
6/16/2016	ME	0.2	save/file opt-in's discovery documents that were sent via email
6/16/2016	MD	2.5	editing legal argument on outside sales exemption 2.5
6/16/2016	ME	2.5	compile data about hours plaintiffs worked from answer to interrogatories responses
6/16/2016	ME	0.2	MS/ME discuss project of compiling testimony about hours plaintiffs worked from answer to interrogatories
6/16/2016	JF	0.2	JF/ME discuss project of compiling testimony about hours plaintiffs work to assist attorneys with summary judgment
6/16/2016	MS	2.5	review and revise legal argument, including adding sections
6/16/2016	ME	0.2	email answer to interrogatories to opt-in for review
6/16/2016	ME	0.3	review opt-in's discovery documents to begin to prepare them for production to defense counsel
6/16/2016	MS	0.2	MS/ME discuss project of compiling testimony about hours plaintiffs worked from answer to interrogatories
6/16/2016	ME	0.6	contact opt-ins to follow up about [questions] they completed for rog and sending discovery documents
6/16/2016	ME	0.1	verify if opt-in is on list of discovery non-responders
6/16/2016	ME	0.2	email attorney MD status of new responses to opt-in discovery
6/16/2016	ME	0.2	JF/ME discuss project of compiling testimony about hours plaintiffs work to assist attorneys with summary judgment
6/16/2016	JF	0.2	Call from a claimant re case update 0.2
6/17/2016	ME	0.1	send email to MD about opt-in's concerns
6/17/2016	MS	0.9	review and annotate weekly work hours testimony for use in briefing and 56.1
6/17/2016	ME	0.3	telephone call from opt-in about case update
6/17/2016	JF	0.1	ME/JF Evaluate search findings in the ROGs/depo testimony research for the purposes of SJ composition 0.1
6/17/2016	JF	0.1	Compose an email to MS re hours worked testimony 0.1
6/17/2016	ME	0.1	edit format of spreadsheet for tracking hours clients worked based on testimony for use by attorneys for summary judgment
6/17/2016	JF	0.3	Compile deposition testimony re hours worked in preparation for SJ 0.3
6/17/2016	ME	0.2	email answer to interrogatories to opt-in for review
6/17/2016	ME	0.1	MS/ME discuss process for providing feedback about draft legal argument for summary judgment
6/17/2016	JF	2.8	Perform a depo digest of claimant's testimony 2.8
6/17/2016	JF	2.6	Review SJ draft 2.6
6/17/2016	MA	1.6	proofreading summary judgment motion draft
6/17/2016	MD	2	edit legal argument for summary judgment 2.0
6/17/2016	ME	0.1	check [questionnaire] for new responses to [questions] for opt-in rog

Date	Staff	Amount of Time	Description
6/17/2016	ME	0.1	reply to plaintiff's email about deposition review
6/17/2016	MR	0.2	MR/ME discuss spreadsheet containing hours plaintiffs worked from rog responses, declarations, and deposition testimony to assist attorneys with summary judgment
6/17/2016	ME	0.1	JF/ME discuss process for providing feedback about draft legal argument for summary judgment
6/17/2016	ME	0.6	verify accuracy of information in spreadsheet about hours plaintiffs worked according to their rog responses
6/17/2016	ME	1.2	work on digest of opt-in's deposition transcript to assist attorneys with summary judgment
6/17/2016	MS	0.1	MS/ME discuss process for providing feedback about draft legal argument for summary judgment
6/17/2016	ME	1.6	complete deposition digest of opt-in's transcript to assist attorneys with summary judgment
6/17/2016	ME	0.2	MR/ME discuss spreadsheet containing hours plaintiffs worked from rog responses, declarations, and deposition testimony to assist attorneys with summary judgment
6/17/2016	ME	0.1	email link to case updates to opt-in
6/17/2016	ME	0.1	ME/JF Evaluate search findings in the ROGs/depo testimony research for the purposes of SJ composition 0.1
6/17/2016	ME	0.4	develop plan for charting information about the hours plaintiffs worked for summary judgment .3; draft email to attorney about the plan .1
6/17/2016	ME	1.2	edit draft of legal argument for summary judgment
6/18/2016	MR	8	perform name matchup to get Emp Code and TM code on source data sheet for RSR hours worked 1.0, normalize values for hours worked in source data sheet .3, set up analysis workbook 1.5, modify source data in average wage workbook for use with specific examples .8, create pivot chart for average wage data overall and >=2011 1.0, pull average wage data to analysis workbook for lookup table 2.0, create lookup equations .3, create reg rate equations .3, create difference columns for TMs vs TSRs .3, review previous payroll work for bonus/bonus spread info .5, modify previous payroll work including revision of scripts used to get bonus vs bonus spread comparison .8, investigate effect of using bonus spread instead of bonus for regular rate and wage analysis .7
6/19/2016	MR	2.4	make various changes to wage comparison workbook 1.0, create standalone sheet of results .5, compose detailed email about analysis to send to team .9
6/19/2016	MR	0.2	case file organization .2
6/20/2016	MA	0.9	creating deposition digest for plaintiff's deposition
6/20/2016	MD	4	editing summary judgment motion 4.0
6/20/2016	ME	1.6	read legal argument for summary judgment to provide feedback for attorneys
6/20/2016	MA	0.2	proposing additional changes to summary judgment motion
6/20/2016	MS	0.4	MS/MA discuss MA's proposed changes to summary judgment motion
6/20/2016	MA	0.4	MS/MA discuss MA's proposed changes to summary judgment motion
6/20/2016	ME	3	work on deposition digest of opt-in's transcript to assist attorneys with summary judgment
6/21/2016	ME	2.6	work on deposition digest of opt-in's transcript to assist attorneys with summary judgment
6/21/2016	ME	2.9	work on deposition digest of opt-in's transcript to assist attorneys with summary judgment
6/21/2016	KIM	0.7	Draft certification brief
6/21/2016	ME	0.1	telephone call from opt-in for case update



Date	Staff	Amount of Time	Description
6/21/2016	MD	2	review and editing summary judgment briefing 2.0
6/21/2016	MD	2.5	drafting 56.1 statement
6/21/2016	MD	0.5	draft section concerning McCartt 0.5
6/21/2016	MA	0.7	proofreading latest draft of Kellogg motion for summary judgment
6/21/2016	KIM	3	Draft certification brief
6/21/2016	MA	1.9	completing deposition digest to assist attorneys in preparing summary judgment motion
6/21/2016	KIM	0.4	Draft certification brief
6/21/2016	KIM	0.8	Draft certification brief
			determine court reporting service used for plaintiff depositions to check on status of
6/21/2016	ME	0.2	transcripts
6/21/2016	KIM	2.2	Draft certification brief
6/21/2016	ME	0.1	email link to edits for egal argument for summary judgment to MS
			email MD to deterime if we received remaining deposition transcripts for named plaintiff
6/21/2016	ME	0.1	depositions
6/22/2016	KIM	1.4	Draft certification outline
6/22/2016	ME	0.2	returned telephone call to intake interested in joinin the case
			email MD to update on opt-in discovery and to determine next steps for producing to
6/22/2016	ME	0.1	defense counsel
6/22/2016	MD	4.5	drafting 56.1 statement 4.5
6/22/2016	KIM	1.2	Draft certification outline
			telephone call to court reporter to check on status of deposition transcripts for named
6/22/2016	ME	0.1	plaintiffs
6/22/2016	ME	0.1	email deposition transcript to plaintiff for review
6/22/2016	ME	0.1	email deposition transcript to opt-in for review
6/22/2016	ME	0.1	email deposition transcript to plaintiff for review
6/22/2016	ME	0.1	MD/ME determine date plaintiffs' transcript review is due
6/22/2016	ME	0.1	email MD about intake interested in joining the case
			MS/MD/ME provide update to team about progress of individual tasks for summary
6/22/2016	ME	0.1	judgment and class certification
			MD/ME discuss information needed from intake to evaluate him as a named plaintiff for
6/22/2016	ME	0.2	a new case
			MD/ME discuss information needed from intake to evaluate him as a named plaintiff for
6/22/2016	MD	0.2	a new case
			check [questionnaire] to see if any newly completed [questions]s for opt-ins' answers to
6/22/2016	ME	0.1	interrogatories
			work on deposition digest of opt-in's transcript to assist attorneys with summary
6/22/2016	ME	1.1	judgment
			MD/ME discuss formatting preparation needed for summary judgment and class
6/22/2016	MD	0.1	certification briefs
6/22/2016	ME	0.1	email MD about status of named plaintiff transcripts
			work on deposition digest of opt-in's transcript to assist attorneys with summary
6/22/2016	ME	2.1	judgment
			MD/ME discuss formatting preparation needed for summary judgment and class
6/22/2016	ME	0.1	certification briefs
6/22/2016	MR	3.3	initial work on TSR/TM wage comparisons
6/22/2016	ME	0.1	listen to voicemail from intake interested in joining the case .1
			MS/MD/ME provide update to team about progress of individual tasks for summary
6/22/2016	MS	0.1	judgment and class certification

Date	Staff	Amount of Time	Description
6/22/2016	MD	0.1	MS/MD/ME provide update to team about progress of individual tasks for summary judgment and class certification
6/23/2016	ME	0.5	work on deposition digest of opt-in's transcript to assist attorneys with summary judgment
6/23/2016	ME	1.4	complete deposition digest of plaintiff's transcript to assist attorneys with summary judgment and class certification
6/23/2016	ME	0.3	MD/ME discuss responding to client's concerns about status in the case
6/23/2016	MD	0.3	MD/ME discuss responding to client's concerns about status in the case
6/23/2016	KIM	0.5	Collect facts for use in cert brief
6/23/2016	ME	0.2	complete deposition digest of opt-in's transcript to assist attorneys with summary judgment
6/23/2016	ME	1.4	complete deposition digest of plaintiff's transcript to assist attorneys with summary judgment and class certification
6/23/2016	MD	0.5	review and edit summary judgment briefing 0.5
6/23/2016	ME	0.2	MS/ME determine information to include on deposition digest outline for 5 named plaintiffs who were deposed for rule 23 class certification
6/23/2016	ME	0.1	email MD question client has about overpayment
6/23/2016	MS	1.2	MS/KW meet re certification brief
6/23/2016	MD	4	drafting 56.1 statement 4.0
6/23/2016	KIM	1.2	MS/KW meet re certification brief
6/23/2016	ME	0.3	telephone call from opt-in for case update and additional questions .2; notes from conversation .1
6/23/2016	ME	0.2	update deposition digest outline to include information about class certification for named plaintiff digests
6/23/2016	MA	4.2	creating deposition digest to assist attorneys in gathering facts for summary judgment
6/23/2016	ME	0.1	left voicemail for opt-in to return his call
6/23/2016	ME	0.2	MR/ME discuss data compiled from opt-in rog responses regarding hours worked to assist attorneys with summary judgment
6/23/2016	MR	0.2	MR/ME discuss data compiled from opt-in rog responses regarding hours worked to assist attorneys with summary judgment
6/23/2016	ME	0.1	prepare outline needed to gather opt-in testimony for class certification
6/23/2016	MD	0.4	md/mr discussing calculations needed for summary judgment exhibit 0.4
6/23/2016	ME	1.1	complete deposition digest of plaintiff's transcript to assist attorneys with summary judgment and class certification
6/23/2016	MA	1.9	creating deposition digest to assist attorneys in gathering facts for summary judgment
6/23/2016	ME	0.1	MS/ME discuss testimony needed from depositions for class certification
6/23/2016	MS	0.2	MS/ME determine information to include on deposition digest outline for 5 named plaintiffs who were deposed for rule 23 class certification
6/23/2016	MS	0.1	MS/ME discuss testimony needed from depositions for class certification
6/23/2016	ME	0.1	telephone call to opt-in to schedule time for him to discuss status in case with attorney
6/23/2016	MR	0.4	md/mr discussing calculations needed for summary judgment exhibit 0.4
6/24/2016	MS	0.2	MS/ME discuss details about testimony needed about job duties for class certification brief
6/24/2016	MR	2.5	initial work on draft declaration regarding wage comparisons
6/24/2016	CM	0.2	call from client re status of case (.2)
6/24/2016	ME	0.1	MD/ME discuss exhibits needed for summary judgment regarding rog testimony about hours worked

Date	Staff	Amount of Time	Description
6/24/2016	MR	0.1	read and reply to atty MS email about average class member compensation
6/24/2016	MR	0.1	read and reply to email from MD about weighted average wage
6/24/2016	ME	1.9	work on compiling plaintiff deposition testimony about job duties to assist attorneys with class certification brief
6/24/2016	ME	0.5	complete deposition digest of plaintiff's transcript to assist attorneys with class certification
6/24/2016	ME	0.2	MS/ME discuss details about testimony needed about job duties for class certification brief
6/24/2016	MD	0.4	MD/ME telephone call with client to discuss job title status as it relates to this case
6/24/2016	ME	1.2	work on compiling plaintiff deposition testimony about job duties to assist attorneys with class certification brief
6/24/2016	MD	0.1	MD/ME discuss exhibits needed for summary judgment regarding rog testimony about hours worked
6/24/2016	ME	0.1	reply to MS's email regarding plaintiff testimony about hours worked to assist attorneys with summary judgment
6/24/2016	MD	4	drafting 56.1 statement 4.0
6/24/2016	ME	0.2	review most recent draft of legal argument for summary judgment
6/24/2016	ME	0.4	MD/ME telephone call with client to discuss job title status as it relates to this case
6/24/2016	ME	2.2	work on compiling plaintiff deposition testimony about job duties to assist attorneys with class certification brief
6/25/2016	KIM	1	Work on certification draft
6/25/2016	MD	4	drafting 56.1 statement for summary judgment briefing 4.0
6/25/2016	KIM	0.8	Work on certification draft
6/26/2016	KIM	0.7	Work on certification brief
6/26/2016	MR	3.3	examine non-opt-in class member compensation data .5, identify outliers .3, calculate average annualized income for non-opt-in class members .7, create distribution chart of annual income brackets and number of class members in each 1.8
6/26/2016	KIM	0.6	Work on certification brief
6/26/2016	KIM	1.2	Work on certification brief
6/26/2016	KIM	1	Work on certification brief
6/26/2016	MD	5	drafting 56.1 statement for summary judgment brief 5.0
6/26/2016	KIM	0.7	Work on certification brief
6/26/2016	KIM	0.5	Work on certification brief
6/26/2016	MR	2.3	revise draft wage comparisons 1.2, convert into draft exhibit .5, continued work on wage comparison draft declaration .6
6/27/2016	MD	0.2	MD/JF Review the process to format exhibits for the purposes of 56.1 filing (Statement of Facts) 0.2
6/27/2016	MR	0.1	read and reply to para ME concerns about how best to mark exhibit sections
6/27/2016	JF	0.1	JF/ME review process for compiling defendant's deposition testimony for summary judgment
6/27/2016	ME	0.1	ME/JF Review process to format depo testimony to file 56.1 (Statement of Facts) 0.1
6/27/2016	ME	0.1	review draft declaration regarding hours plaintiffs worked for summary judgment
6/27/2016	ME	0.9	compile plaintiff deposition testimony regarding hours worked to use as exhibits for summary judgment

Date	Staff	Amount of Time	Description
6/27/2016	ME	1.3	compile testimony about hours plaintiffs worked to assist attorneys with class certification
6/27/2016	JF	0.2	MD/JF Review the process to format exhibits for the purposes of 56.1 (Statement of Facts) 0.2
6/27/2016	ME	1	determine best process for following court exhibits rules for summary judgment and class certification .9; email options to the team .1
6/27/2016	ME	0.1	JF/ME review process for compiling defendant's deposition testimony for summary judgment
6/27/2016	ME	0.7	compile defendant deposition testimony to use as exhibits for summary judgment/56.1 statement
6/27/2016	JF	4.6	Gather potential exhibits for 56.1 filing (Statement of Facts) 4.6
6/27/2016	MD	0.5	MS/KIM/MD/JF/ME review steps needed to prepare summary judgment and class certification briefs for filing by deadline
6/27/2016	MR	0.1	read and reply to email from para ME about client state data
6/27/2016	JF	0.5	MS/KIM/MD/JF/ME review steps needed to prepare summary judgment and class certification briefs for filing by deadline
6/27/2016	KIM	0.5	MS/KIM/MD/JF/ME review steps needed to prepare summary judgment and class certification briefs for filing by deadline
6/27/2016	MS	0.5	MS/KIM/MD/JF/ME review steps needed to prepare summary judgment and class certification briefs for filing by deadline
6/27/2016	MS	0.7	MS KW MD Meet RE state law class certification (MD 10-1030)
6/27/2016	MD	0.5	MS KW MD Meet RE state law class certification (MD 10-1030)
6/27/2016	ME	0.5	MS/KIM/MD/JF/ME review steps needed to prepare summary judgment and class certification briefs for filing by deadline
6/27/2016	CM	0.4	CM/JF Review the process to prepare for Exhibit formatting for 56.1 (Statement of Facts) filing 0.4
6/27/2016	ME	0.2	JF/ME review process for compiling deposition testimony exhibits for summary judgment and class certification
6/27/2016	MS	0.1	MS/ME review task of compiling testimony regarding hours worked for class certification brief
6/27/2016	KIM	0.7	Research numerosity for certification brief
6/27/2016	JF	0.1	ME/JF Review process to format depo testimony to file 56.1 (Statement of Facts) 0.1
6/27/2016	JF	0.4	CM/JF Review the process to prepare for Exhibit formatting for 56.1 (Statement of Facts) filing 0.4
6/27/2016	MD	0.2	MD/ME discuss process for organizing exhibits for summary judgment and class certification
6/27/2016	ME	0.1	MS/ME review task of collecting testimony about sales experience for summary judgment
6/27/2016	ME	0.2	MD/ME discuss process for organizing exhibits for summary judgment and class certification
6/27/2016	MR	0.2	read and reply to atty MD comments in declaration and email
6/27/2016	JF	0.1	ME/JF Update re the latest case development 0.1
6/27/2016	MR	0.6	read and reply to MD's email question about the selection of reps in wage comparison .1, examine wage comparison calcs and note various problems .4. email to attys about duplication of one rep's info in calcs .1,
6/27/2016	ME	0.1	respond to client's email for case update
6/27/2016	MS	0.1	MS/ME review task of collecting testimony about sales experience for summary judgment
6/27/2016	KIM	0.7	MS KW MD Meet RE state law class certification (MD 10-1030)

Date	Staff	Amount of Time	Description
6/27/2016	KIM	1.2	Relation back research for certification brief
6/27/2016	ME	1.2	compile testimony about named plaintiff employment history for summary judgment
6/27/2016	KIM	1.5	Relation back research for certification brief
6/27/2016	ME	0.1	MS/ME review task of compiling testimony regarding hours worked for class certification brief
6/27/2016	CM	0.2	JF/CM review procedure for preparing exhibits (.2)
6/27/2016	JF	0.2	JF/CM review procedure for preparing exhibits (.2)
6/27/2016	MR	0.9	analysis of wage comparison reps who worked in MF .8, email to attys about same .1
6/27/2016	ME	0.1	ME/JF Update re the latest case development 0.1
6/28/2016	KIM	0.7	State statute/regulation research for certification brief
6/28/2016	JF	4.2	Gather exhibits for 56.1 4.2
6/28/2016	MR	0.3	read and multiple replies to MD about lost exhibits .1; search for lost Niles deposition exhibits .2
6/28/2016	KIM	0.3	State statute/regulation research for certification brief
6/28/2016	MS	0.9	tc w/ ET re sj brief comments
6/28/2016	KIM	1.8	State statute/regulation research for certification brief
6/28/2016	MS	0.9	incorporating comments from tc w/ ET into brief, including legal and record research
6/28/2016	MD	6	drafting 56.1 statement 6.0
6/28/2016	JF	0.6	Help select planogram samples to be inserted into 56.1 (Statement of Facts) 0.6
6/28/2016	JF	2.4	Search through workwiths to be included as exhibits in 56.1 (Statement of Facts) 2.4
6/28/2016	MS	1.1	drafting 23(a)(1) section of class cert brief, including legal research
6/28/2016	MS	1.4	drafting 23(a)(2) section of class cert brief, including legal research
6/28/2016	MS	0.7	drafting 23(a)(3) section of class cert brief, including legal research
6/28/2016	MS	0.2	review Subit declaration ISO class cert
6/28/2016	JF	0.6	Look for plaintiffs' Midyear/Annual reviews to be included in 56.1 (Statement of Facts) 0.6
6/28/2016	MS	1.2	drafting 23(a)(4) section of class cert brief, including legal research
6/28/2016	MS	0.3	record review for evidence on MN hours claims
6/28/2016	MS	0.2	record review for evidence of median Class Member pay
6/28/2016	KIM	0.9	Research case law for additional examples of certified multistate class actions for certification
6/28/2016	MS	0.3	adding SDNY case to sj brief re labels v. duties
6/28/2016	MS	0.2	ms/kw discuss progress and next steps for class cert brief
6/28/2016	MS	1.1	finalizing sj brief for forming and circulation
6/28/2016	KIM	0.2	ms/kw discuss progress and next steps for class cert brief
6/28/2016	ME	0.2	telephone call from opt-in for case update
6/28/2016	ME	0.3	compile plaintiff deposition testimony regarding hours worked to use as exhibits for summary judgment
6/28/2016	ME	0.8	compile defendant deposition testimony to use as exhibits for summary judgment
6/28/2016	ME	2.5	work to compile list of clients who did not complete sales training to assist attorneys with summary judgment
6/28/2016	ME	4.4	prepare draft summary judgment brief prior to sending to local counsel for review: format brief 2.0; mark citations 2.0; create table of authorities .2; create table of contents .2

Date	Staff	Amount of Time	Description
6/28/2016	ME	0.1	MS/ME review plaintiff deposition testimony about hours worked to include as exhibit for summary judgment
6/28/2016	AG	0.3	review docket folder (confirmation of all docket entry)
6/28/2016	KIM	1	Research case law for additional examples of certified multistate class actions for certification
6/28/2016	MS	0.1	MS/ME review plaintiff deposition testimony about hours worked to include as exhibit for summary judgment
6/28/2016	MS	1.1	incorporating ET written comments into brief, including legal and record research
6/29/2016	AG	0.3	review ECF/Court rules on filing under seal/PDF size
6/29/2016	JF	5.1	Research for cites for the purposes of 56.1 filing 5.1
6/29/2016	MA	1.4	cross-checking interrogatories produced with claimants' answers to ensure accuracy in exhibits for summary judgment
6/29/2016	MA	1.8	proofreading motion for class certification
6/29/2016	MS	0.8	drafting section on state laws' os exemptioni being analogous to FLSA
6/29/2016	MS	0.5	identifying and drafting footnote on dropped class claims
6/29/2016	MS	1.2	drafting Sweeney dec ISO class cert
6/29/2016	JF	0.1	ME/JF Check in about the tasks/workload for the day 0.1
6/29/2016	ME	1.9	finish formatting draft brief for summary judgment before sending to local counsel for review
6/29/2016	MS	0.2	MS KW meet RE claims not advancing (for certification brief).
6/29/2016	MS	2.2	drafting class cert brief, predominance and superiority sections, including legal research save plaintiff deposition testimony in condensed format to be used as exhibit for summary judgment
6/29/2016	ME	0.3	summary judgment
6/29/2016	KIM	2	Obtain language for state law and FLSA tracking for certification.
6/29/2016	KIM	1.8	Work on pulling facts into certification brief.
6/29/2016	MS	0.5	drafting Sweeney dec ISO sj
6/29/2016	KIM	2.2	KW MS meet to discuss state statues/regs for certification (MD .5)
6/29/2016	MS	0.6	drafting Subit decl ISO class cert
6/29/2016	ME	0.1	ME/JF Check in about the tasks/workload for the day 0.1
6/29/2016	MD	0.3	MD/ME review draft summary judgment brief before sending to local counsel for feedback
6/29/2016	KIM	1.2	Work on noting which claims not advancing (for certification brief).
6/29/2016	JF	0.2	Send email to MD re the workwiths location specifications for the purposes of 56.1 filing 0.2
6/29/2016	ME	3	locate exhibits for summary judgment motion 2.7; prepare exhibits by converting to pdf .3
6/29/2016	ME	0.3	MD/ME review draft summary judgment brief before sending to local counsel for feedback
6/29/2016	MS	0.1	MS/ME review draft summary judgment brief before sending to local counsel for feedback
6/29/2016	MS	0.6	research on state law os exemptions
6/29/2016	KIM	0.2	MS KW meet RE claims not advancing (for certification brief).
6/29/2016	MD	3	drafting 56.1 statement 3.0
6/29/2016	ME	2.2	compile list of opt-in's who did not attend KASA training per their rog testimony to use as exhibit for summary judgment
6/29/2016	ME	0.1	ME/JF Check in about the research for cites 0.1
6/29/2016	MD	6	reviewing deposition transcripts for support of plaintiffs factual assertions in summary judgment briefing 6.0



Date	Staff	Amount of Time	Description
6/29/2016	JF	0.6	Format exhibits for Summary Judgment filing 0.6
6/29/2016	MD	0.7	KW MS meet to discuss state statues/regs for certification (MD .5)
6/29/2016	JF	0.1	ME/JF Check in about the research for cites 0.1
6/29/2016	MS	0.7	KW MS meet to discuss state statues/regs for certification (MD .5)
6/29/2016	ME	0.1	MS/ME review draft summary judgment brief before sending to local counsel for feedback
6/30/2016	ME	2.4	create list of opt-ins who had no sales training to use as exhibit for summary judgment motion
6/30/2016	KIM	0.2	Time entry for cert brief related tasks and cert brief related meetings
6/30/2016	KIM	0.2	Read Ed's comments on certification brief.
6/30/2016	KIM	0.9	Pull facts into cert brief
6/30/2016	KIM	0.2	Add to numerosity argument for certification brief.
6/30/2016	KIM	0.9	Search 30b6 depositions for additional supporting facts
6/30/2016	JF	4.2	Prepare exhibits for Summary Judgment filing 4.2
6/30/2016	AG	0.2	PCT ECF Clerk (filing of physical material procedure)
6/30/2016	MS	0.1	MS KW meet RE legal authority citation for cert.
6/30/2016	MD	0.1	call with defense counsel about summary judgment filing 0.1
6/30/2016	AG	0.1	prepare draft (Notice of Filing of Physical Material)
6/30/2016	KIM	0.1	MS KW meet RE legal authority citation for cert.
6/30/2016	KIM	0.8	Legal citation work in cert brief
6/30/2016	JF	6.4	Format exhibits for Summary Judgment filing 6,4
6/30/2016	KIM	0.4	Legal citation work in cert brief.
6/30/2016	ME	5.4	prepare exhibits for class certification: create chart of deposition testimony about plaintiffs' job duties 2.5; verify accuracy of deposition citations 1.9; pull pages of deposition pages and highlight cited testimony .10
6/30/2016	KIM	0.8	Legal citation work in cert brief
6/30/2016	MD	12	editing summary judgment briefing to include supporting cites 12.0
6/30/2016	ME	5.5	format class certification brief, create table of authorities and table of contents
6/30/2016	MS	0.1	MS KW meet RE references to selling in cert brief
6/30/2016	MA	0.8	formatting picture to use as exhibit in summary judgment motion
6/30/2016	MS	0.2	MS KW meet RE facts for cert brief
6/30/2016	KIM	0.2	MS KW meet RE facts for cert brief
6/30/2016	KIM	0.1	MS KW meet RE references to selling in cert brief
6/30/2016	KIM	0.6	Search 30b6 depositions for additional supporting facts
6/30/2016	MR	2.4	work on Deponent wage comparison analysis
6/30/2016	KIM	0.7	Review 30b6 depositions for supporting language for cert
6/30/2016	KIM	0.5	Legal citation work in cert brief
6/30/2016	ME	3.3	prepare exhibits for class certification brief
6/30/2016	KIM	0.2	Search 30b6 depositions for additional supporting facts
6/30/2016	KIM	0.8	Work on facts for cert brief
7/1/2016	MA	1	preparing exhibits for summary judgment motion
7/1/2016	KIM	0.5	Re-proof hard copy of cert brief after edit input.
7/1/2016	MR	0.4	initiate and reply several times to email thread with MS about need for local rules version of MR rule 23 decl .2, create signed version of new version of declaration .2
7/1/2016	MR	0.3	transfer work files to server .1, compose detailed email to attorneys MS and MD about deponent wage comparison analysis .2
7/1/2016	MS	0.1	MS KW discuss remaining steps for finishing cert brief
7/1/2016	MR	0.1	follow up email exchange regarding reps in wage comparison who worked as well in MF .1

Date	Staff	Amount of Time	Description
7/1/2016	MA	0.2	assist JF in merging exhibit pages for summary judgment motion
7/1/2016	MR	1	revised wage comparison exhibit and draft declaration .9, email to attys about same .1
7/1/2016	KIM	0.6	Proofread cert on hard copy
7/1/2016	KIM	1.2	Proofread cert on hard copy
7/1/2016	ME	1	redact confidential information from exhibits for summary judgment
7/1/2016	MA	0.2	MD/MA review excerpts from document needed for exhibit so MA can prepare exhibit
7/1/2016	MA	0.1	preparing exhibit for class certification motion
7/1/2016	AG	0.3	prepare document (Exhibits) for filing with court
7/1/2016	MS	0.1	MS/MA review changes needed to exhibit for class certification motion
7/1/2016	MA	0.1	preparing exhibit for summary judgment motion
7/1/2016	MD	0.2	MD/MA review excerpts from document needed for exhibit so MA can prepare exhibit
7/1/2016	KIM	1.1	Apply hard copy edits to cert file
7/1/2016	MA	0.2	proofreading introduction and conclusion to summary judgment motion
7/1/2016	KIM	0.3	Apply remaining proofing edits to cert brief file from hard copy
7/1/2016	KIM	0.1	MS KW discuss remaining steps for finishing cert brief
7/1/2016	ME	0.1	telephone call from opt-in for case update
7/1/2016	MR	1.4	redo calculations to clarify which reps in wage comparison worked as well in MF and for how long 1.1, create chart for attys and email them results .3
7/1/2016	ME	0.4	redact confidential information from class certification brief
7/1/2016	KIM	0.1	Draft email reporting tasks finished and remaining for cert brief.
7/1/2016	ME	1.4	prepare exhibits for class certification
7/1/2016	MR	0.6	revise rule 23 declaration and create signed version
7/1/2016	ME	1.5	locate documents produced by defense counsel to use as exhibits for summary judgment
7/1/2016	MR	0.1	check in with atty MD as to filing of brief
7/1/2016	MR	0.5	create sample of Motus data in excel and pdf for atty MD for brief
7/1/2016	MR	0.3	review suggested edits in declaration .1; make revisions .1, suggest further changes .1
7/1/2016	JF	7.6	Format exhibits for Summary Judgment filing 7.6
7/1/2016	MR	0.1	read and reply to email from atty MS about draft declaration
7/1/2016	MA	0.5	adding exhibit numbers to motion for class certification
7/1/2016	MD	12.5	editing and finalizing summary judgment and class certification briefing for filing 12.5
7/1/2016	MA	1	proofreading summary judgment brief
7/1/2016	MR	0.9	work on draft declaration for rule 23 average annual wage .8, email MS about draft declaration .1
7/1/2016	KIM	0.7	Re-proof hard copy of cert brief after edit input.
7/1/2016	ME	0.5	review class certification brief to ensure all citations have been marked for table of authorities
7/1/2016	MA	0.1	MS/MA review changes needed to exhibit for class certification motion
7/1/2016	MR	0.8	continued work on revised wage comparison declaration and exhibit .6, create final signed declaration .2
7/1/2016	KIM	1	Edit cert document with revised state statute citations
7/1/2016	MR	0.2	read and reply to atty MD email about using a revised ver of original wage comparisons
7/4/2016	MD	7	drafting 56.1 statement 7.0
7/5/2016	AG	0.1	AG/JF Clarification re partial vs full summary judgment motion 0.1

Date	Staff	Amount of Time	Description
7/5/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#393 - DECLARATION of James M. Nelson in Support of Defendants' Motion to Decertify FLSA Collective Action filed by Defendants Kellogg Company, Kellogg Sales Company re [392] MOTION To Decertify FLSA Collective Action (Attachments: # (1) Exhibit Part 1, # (2) Exhibit Part 2, # (3) Exhibit Part 3, # (4) Exhibit Part 4, # (5) Exhibit Part 5)(Nelson, James)
7/5/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#392 - MOTION To Decertify FLSA Collective Action by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Proposed Order) Noting Date 8/19/2016, (Nelson, James)
7/5/2016	JF	0.1	ME/JF Check in re the review of the Defendant's Collective Action decertification brief 0.1
7/5/2016	MD	1	read kellogg's summary judgment briefing 1.0
7/5/2016	MD	0.5	read decertification brief 0.5
7/5/2016	MD	0.5	outline arguments re kellog summary judgment briefing 0.5
7/5/2016	ME	1	read defendant's motion to decertify FLSA collective action
7/5/2016	ME	0.1	ME/JF Check in re the review of the Defendant's Collective Action decertification brief 0.1
7/5/2016	AG	2.1	prepare courtesy copy of ECF filed documents for Judge (MOTION for Summary Judgment, MOTION to Seal, MOTION to Certify Class, MOTION to Seal) (tabbed)
7/5/2016	ME	0.2	send electronic copies of exhibits filed under seal for class cert to defense counsel
7/5/2016	JF	0.1	AG/JF Clarification re partial vs full summary judgment motion 0.1
7/5/2016	ME	0.1	email MD about client's question about new job title
7/5/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#394 - MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment by Defendants Kellogg Company, Kellogg Sales Company. Oral Argument Requested. (Attachments: # (1) Proposed Order) Noting Date 8/19/2016, (Nelson, James)
7/5/2016	ME	0.1	listen to voicemail from opt-in
7/5/2016	CLER	0.2	Transfer documents recd from ECF system to docket file and create file copy (Docket#395 - DECLARATION of James M. Nelson in Support of Defendants' Motion for Summary Judgment or, in the Alternative, Partial Summary Judgment filed by Defendants Kellogg Company, Kellogg Sales Company re [394] MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment (Attachments: # (1) Exhibit Part 1, # (2) Exhibit Part 2, # (3) Exhibit Part 3, # (4) Exhibit Part 4, # (5) Exhibit Part 5, # (6) Exhibit Part 6, # (7) Exhibit Part 7, # (8) Exhibit Part 8, # (9) Exhibit Part 9)(Nelson, James)
7/5/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#396 - REQUEST by Defendants Kellogg Company, Kellogg Sales Company for Judicial Notice in Support of Motion for Summary Judgment or, in the Alternative, Partial Summary Judgment on Claims of Individuals Who Did Not Disclose This Case in Bankruptcy Proceedings re [394] MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment (Nelson, James)
7/5/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#398 - MOTION to Seal by Plaintiff Patty Thomas. (Attachments: # (1) Dunn Declaration, # (2) Proposed Order) Noting Date 7/15/2016, (Dunn, Matt)

Date	Staff	Amount of Time	Description
			Transfer documents recd from ECF system to docket file and create file copy (Docket#397 - MOTION for Summary Judgment by Plaintiff Patty Thomas. Oral Argument Requested. (Attachments: # (1) Dunn Declaration, # (2) Exhibit, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit, # (6) Exhibit, # (7) Exhibit, # (8) Exhibit, # (9) Exhibit, # (10) Exhibit, # (11) Exhibit, # (12) Exhibit, # (13) Exhibit, # (14) Exhibit, # (15) Exhibit, # (16) Exhibit, # (17) Exhibit, # (18) Exhibit, # (19) Exhibit, # (20) Exhibit, # (21) Exhibit, # (22) Exhibit, # (23) Exhibit, # (24) Exhibit, # (25) Exhibit, # (26) Exhibit, # (27) Exhibit, # (28) Exhibit, # (29) Exhibit, # (30) Exhibit, # (31) Exhibit, # (32) Exhibit, # (33) Exhibit, # (34) Exhibit, # (35) Exhibit, # (36) Exhibit, # (37) Exhibit, # (38) Exhibit, # (39) Exhibit, # (40) Exhibit, # (41) Exhibit, # (42) Exhibit, # (43) Exhibit, # (44) Exhibit, # (45) Exhibit, # (46) Exhibit, # (47) Exhibit, # (48) Exhibit, # (49) Exhibit, # (50) Exhibit, # (51) Exhibit, # (52) Exhibit, # (53) Exhibit, # (54) Exhibit, # (55) Exhibit, # (56) Exhibit, # (57) Exhibit, # (58) Exhibit, # (59) Exhibit, # (60) Exhibit, # (61) Russo Declaration) Noting Date 8/19/2016, (Dunn, Matt)
7/5/2016	CLER	0.3	
7/5/2016	ME	1.2	read defendant's motion for summary judgment
			send electronic copies of brief and exhibits filed under seal for summary judgment to
7/5/2016	ME	0.2	defense counsel
			Transfer documents recd from ECF system to docket file and create file copy (Docket#399 - UNREDACTED SEALED [397] MOTION for Summary Judgment , [398] MOTION to Seal , by Plaintiff Patty Thomas (Attachments: # (1) Exhibit, # (2) Exhibit, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit, # (6) Exhibit, # (7) Exhibit, # (8) Exhibit, # (9) Exhibit, # (10) Exhibit, # (11) Exhibit, # (12) Exhibit, # (13) Exhibit, # (14) Exhibit, # (15) Exhibit, # (16) Exhibit, # (17) Exhibit, # (18) Exhibit, # (19) Exhibit, # (20) Exhibit, # (21) Exhibit, # (22) Exhibit, # (23) Exhibit)(Dunn, Matt)
7/5/2016	CLER	0.1	
			Transfer documents recd from ECF system to docket file and create file copy (Docket#400 - MOTION to Certify Class by Plaintiff Patty Thomas. Oral Argument Requested. (Attachments: # (1) Sweeney Declaration, # (2) Exhibit, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit, # (6) Exhibit, # (7) Exhibit, # (8) Exhibit, # (9) Exhibit, # (10) Exhibit, # (11) Exhibit, # (12) Exhibit, # (13) Exhibit, # (14) Exhibit, # (15) Exhibit, # (16) Russo Declaration, # (17) Subit Declaration) Noting Date 8/19/2016, (Dunn, Matt)
7/5/2016	CLER	0.3	
			Transfer documents recd from ECF system to docket file and create file copy (Docket#402 - UNREDACTED SEALED [400] MOTION to Certify Class , [401] MOTION to Seal , by Plaintiff Patty Thomas (Attachments: # (1) Exhibit, # (2) Exhibit, # (3) Exhibit, # (4) Exhibit, # (5) Exhibit)(Dunn, Matt)
7/5/2016	CLER	0.1	
			Transfer documents recd from ECF system to docket file and create file copy (Docket#401- MOTION to Seal by Plaintiff Patty Thomas. (Attachments: # (1) Sweeney Declaration, # (2) Proposed Order) Noting Date 7/15/2016, (Dunn, Matt)
7/5/2016	CLER	0.1	
7/5/2016	ME	0.1	leave voicemail for opt-in, returning his call
7/5/2016	ME	0.1	send case update to opt-in via email
7/5/2016	ME	0.1	change password on defendant's file transfer site to keep account activated
7/5/2016	ME	0.1	reply to opt-in's email about case update
7/5/2016	JF	2.1	Review of the Defendant's motion to decertify Collective Action 2.1
			JF/ME discuss division of paralegal duties for opposition to defendants' motions for
7/6/2016	ME	0.1	decertification and summary judgment
			MD/ME discuss timeline for verifying opt-in data provided by defendants' in
7/6/2016	MD	0.1	decertification and summary judgment motions

Date	Staff	Amount of Time	Description
7/6/2016	ME	1.5	finish reading defendants' motion for summary judgment
			MD/MS/JF/ME discuss legal argument for plaintiffs' opposition to defendants' motions for decertification and summary judgment .7; review timeline and strategy for
7/6/2016	JF	1	completing opposition breifs .3
			MD/MS/JF/ME discuss legal argument for plaintiffs' opposition to defendants' motions for decertification and summary judgment .7; review timeline and strategy for
7/6/2016	MD	1	completing opposition breifs .3
			ME/JF Review the process to review the supporting evidence in the Defendant's recently
7/6/2016	ME	0.5	filed motions (class decert and summary judgment) 0.5
			JF/ME discuss division of paralegal duties for opposition to defendants' motions for
7/6/2016	JF	0.1	decertification and summary judgment
			MD/MS/JF/ME discuss legal argument for plaintiffs' opposition to defendants' motions for decertification and summary judgment .7; review timeline and strategy for
7/6/2016	ME	1	completing opposition breifs .3
			prepare courtesy copy of ECF filed documents for Judge (MOTION for Summary
7/6/2016	AG	1.5	Judgment, MOTION to Seal, MOTION to Certify Class, MOTION to Seal) (tabbed)
7/6/2016	ME	0.1	split document for per attorney's request
7/6/2016	MD	2.5	drafting outline for summary judgment opposition brief 2.5
7/6/2016	JF	2.2	Review of the Defendant's SJ motion 2.2
			ME/JF Review the process to review the supporting evidence in the Defendant's recently
7/6/2016	JF	0.5	filed motions (class decert and summary judgment) 0.5
			MR/ME summarize strategy for preparing opposition to defendants' class certification
7/6/2016	ME	0.2	and summary judgment motions
			MR/ME summarize strategy for preparing opposition to defendants' class certification
7/6/2016	MR	0.2	and summary judgment motions
			MD/MS/JF/ME discuss legal argument for plaintiffs' opposition to defendants' motions for decertification and summary judgment .7; review timeline and strategy for
7/6/2016	MS	1	completing opposition breifs .3
7/6/2016	MD	0.8	md/ms discussing response to Kellogg's SJ motion
7/6/2016	MS	0.8	md/ms discussing response to Kellogg's SJ motion
			MD/ME discuss timeline for verifying opt-in data provided by defendants' in
7/6/2016	ME	0.1	decertification and summary judgment motions
7/6/2016	ME	0.1	schedule team meeting
7/6/2016	AN	0.1	Telephone call for case update
7/7/2016	ME	0.2	download copy of docket for McCartt case
			JF/ME discuss dividing task of checking citations to exhibits within defendants' summary judgment motion to assist attorneys with plaintiffs' opposition to defendants' summary
7/7/2016	ME	0.1	judgment motion
7/7/2016	JF	0.1	MD/JF Check on the progress of the review of Defendant's SJ Motion 0.1
			break out exhibits from defendants' summary judgment motion to assist attorneys with
7/7/2016	ME	0.5	plaintiffs' opposition to defendants' summary judgment motion
			MA/JF Review the task to evaluate evidence used by the Defendants in Motion to
7/7/2016	JF	0.2	Decertify 0.2
			Draft email for MA to begin the Defendant's Motion to Decertify FLSA Collective Action
7/7/2016	JF	0.2	0.2
			verify opt-in consent to sue dates provided by defendants' in their motion for summary
7/7/2016	ME	1.1	judgment
7/7/2016	MD	0.1	MD/JF Check on the progress of the review of Defendant's SJ Motion 0.1
7/7/2016	JS	0.4	assist JF with formatting issues

Date	Staff	Amount of Time	Description
7/7/2016	JF	0.1	JF/ME discuss dividing task of checking citations to exhibits within defendants' summary judgment motion to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/7/2016	MD	2.5	drafting argument re summary judgment briefing 2.5
7/7/2016	ME	3.9	verify information about opt-in bankruptcy provided by defendants in summary judgment motion is accurate (to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion)
7/7/2016	MD	2	outline arguments re summary judgment briefing 2.0
7/7/2016	JF	0.1	ME/JF Review the location to save review documents used to prepare our response to D's Motion to Decertify/SJ Motion 0.1
7/7/2016	ME	0.1	MD/ME discuss location of tolling agreement
7/7/2016	JF	5.1	Review of evidence in the Defendant's SJ Motion 5.1
7/7/2016	MD	0.1	MD/ME discuss location of tolling agreement
7/7/2016	ME	0.2	locate tolling agreement in docket
7/7/2016	ME	0.2	MR/ME discuss best process for verifying defendants' information about opt-ins outside the statute of limitations and who didn't worked in covered positions to assist attorneys with opposition to defendants' summary judgment motion
7/7/2016	ME	0.1	MD/ME discuss process for verifying data about opt-in bankruptcy provided by defendants in decertification motion (to assist with plaintiffs' opposition to defendants' decertification motion)
7/7/2016	MD	0.1	MD/JF Review the location to save documents re Defendant's Opposition to SJ/Collective Action Motion 0.1
7/7/2016	MR	0.2	MR/ME discuss best process for verifying defendants' information about opt-ins outside the statute of limitations and who didn't worked in covered positions to assist attorneys with opposition to defendants' summary judgment motion
7/7/2016	ME	0.1	ME/JF Review the location to save review documents used to prepare our response to D's Motion to Decertify/SJ Motion 0.1
7/7/2016	MD	0.1	MD/ME discuss process for verifying data about opt-in bankruptcy provided by defendants in decertification motion (to assist with plaintiffs' opposition to defendants' decertification motion)
7/7/2016	MA	0.2	MA/JF Review the task to evaluate evidence used by the Defendants in Motion to Decertify 0.2
7/7/2016	JF	0.1	MD/JF Review the location to save documents re Defendant's Opposition to SJ/Collective Action Motion 0.1
7/7/2016	MA	5	cross-checking facts from Kellogg's motion to decertify with deposition testimony and exhibits to ensure accuracy and assist attorneys in drafting response
7/8/2016	ME	3.1	work on verifying accuracy of defendants' summary judgment citations/exhibits to assist attorneys with plaintiffs' opposition to summary judgment motion
7/8/2016	ME	0.2	MR/ME review defendants' summary judgment exhibits regarding opt-ins outside SOL
7/8/2016	MR	0.4	convert SJ excerpt to word document for reference .2, read and highlight items to investigate .2
7/8/2016	MA	0.2	MA/ME/JF Evaluate categories to most effectively review evidence used in Defendant's SJ and Motion to Decertify 0.2
7/8/2016	ME	0.2	MA/ME/JF Evaluate categories to most effectively review evidence used in Defendant's SJ and Motion to Decertify 0.2



Date	Staff	Amount of Time	Description
7/8/2016	MA	5.8	cross-checking facts from Kellogg's motion to decertify with deposition testimony and exhibits to ensure accuracy and assist attorneys in drafting response
7/8/2016	MR	0.2	MR/ME review defendants' summary judgment exhibits regarding opt-ins outside SOL
7/8/2016	MD	0.1	MD/MR discuss Kellogg motion to dismiss and opt-ins we agreed to exclude
7/8/2016	ME	0.3	compile list of opt-ins who have previously been verified to be outside SOL
7/8/2016	MR	0.9	Populate all four Def SJ excel sheets with unique ids
7/8/2016	AG	1.1	prepare courtesy copy of ECF documents filed under seal for Judge (MOTION for Summary Judgment, MOTION to Seal, MOTION to Certify Class, MOTION to Seal) (tabbed)
7/8/2016	ME	0.2	MD/ME discuss responding to client's question about status in this case while under a new job title
7/8/2016	MR	0.1	MD/MR discuss Kellogg motion to dismiss and opt-ins we agreed to exclude
7/8/2016	MR	2.5	convert 3 pdf exhibits into excel sheets .9, perform name matchup to obtain unique ids
7/8/2016	JF	5.9	1.5 Review of evidence in the Defendant's SJ Motion 5.9
7/8/2016	ME	0.1	left voicemail for opt-in, returning his call
7/8/2016	JF	0.2	MA/ME/JF Evaluate categories to most effectively review evidence used in Defendant's SJ and Motion to Decertify 0.2
7/8/2016	MR	0.2	MR/ME discuss process for verifying defendants' information about opt-ins who fall outside of the 2 and 3 year SOL to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/8/2016	JK	0.3	JK/MR Discuss methods to confirm if Respondents assertions about excluded claimants
7/8/2016	MR	0.3	JK/MR Discuss methods to confirm if Respondents assertions about excluded claimants
7/8/2016	ME	1.1	work on verifying accuracy of defendants' summary judgment citations/exhibits to assist attorneys with plaintiffs' opposition to summary judgment motion
7/8/2016	MD	3	drafting summary judgment briefing re outside sales exemption 3.0
7/8/2016	ME	0.5	JF/ME review process for verifying accuracy of cites to evidence in defendants' summary judgment motion to assist attorneys with plaintiffs' opposition to defendants' summary judgment
7/8/2016	ME	0.2	MR/ME discuss process for verifying defendants' information about opt-ins who fall outside of the 2 and 3 year SOL to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/8/2016	MR	3	cross-check the four excel lists of Defendant four SJ exhibits with regard to inclusion/exclusion in one list or another 1.1, create combined list of opt-ins to investigate 1.3, use our list of 62 opt-ins to exclude to mark off from list of opt-ins to investigate .6
7/8/2016	JF	0.5	JF/ME review process for verifying accuracy of cites to evidence in defendants' summary judgment motion to assist attorneys with plaintiffs' opposition to defendants' summary judgment
7/8/2016	MD	0.2	MD/ME discuss responding to client's question about status in this case while under a new job title
7/8/2016	MR	0.1	transfer work files to server
7/8/2016	ME	0.1	reply to opt-in's email asking for case update
7/10/2016	MR	3.6	work on first issue (pre-April 2011) of Defendant SJ assertion about % of base pay 3.2, write up very detailed email about actual % figures .4

Date	Staff	Amount of Time	Description
7/11/2016	KIM	0.1	Draft email RE assignment for sections of opp decert and opp sj briefs.
7/11/2016	KIM	0.5	Study exemption section of decert brief
7/11/2016	KIM	0.3	Review Kellogg docket (.15) locate & print decert & SJ filings (.15).
7/11/2016	KIM	0.2	emails to KW and MD re work distribution for oppositions
7/11/2016	MS	3.6	legal research on decert standards
7/11/2016	KIM	0.1	Enter time for everyone for MS MD KW meeting.
7/11/2016	MA	4.6	comparing testimony cited in Kellogg's motion for decertification with actual depostiion testimony to ensure accuracy and assit attorneys in responding
7/11/2016	KIM	0.8	Skim SJ brief from Kellogg
7/11/2016	MR	1.5	create weekly wage excel sheet to assist in project regarding % of compensation that is base pay, commissions, bonuses
7/11/2016	MS	0.2	email to ET re briefing schedule and commments
7/11/2016	MS	0.3	MS MD KW meet RE addressing exemption arguments other than outside sales for opp to SJ and decert.
7/11/2016	JF	5.1	Review of evidence in the Defendant's SJ Motion 5.1
7/11/2016	MD	0.2	emails to KW and MD re work distribution for oppositions
7/11/2016	MD	0.3	MS MD KW meet RE addressing exemption arguments other than outside sales for opp to SJ and decert.
7/11/2016	KIM	0.3	MS MD KW meet RE addressing exemption arguments other than outside sales for opp to SJ and decert.
7/11/2016	MD	6	drafting summary judgment argument re outside sales exemption 6.0
7/11/2016	KIM	0.5	Read and take notes on first portion of decert brief
7/11/2016	KIM	1	Read and take notes on second portion of decert brief
7/11/2016	MR	2.3	examine past extrapolation work with regard to job titles on opt-in investigation list .6. pull in disputed job title information for selected opt-ins on investigation list .8, examine anomalous data on list .2, spot check some data on list compared to payroll history and damage calcs .5, plan for next steps to investigate .2
7/12/2016	MS	1.1	drafting initial outline for opp
7/12/2016	MA	3.2	comparing testimony cited in Kellogg's motion for decertification with actual depostiion testimony to ensure accuracy and assit attorneys in responding
7/12/2016	JF	0.8	MR/JF Review information related to hours worked in Kellogg's MF division to be used in the Response to Defendant's Motion to Decertify 0.8
7/12/2016	MS	0.3	reivew Kellogg evidence on bankruptcy issue
7/12/2016	KIM	1.8	Compile notes from defendants' filings to prepare arguments RE non-sales exemptions for opp MSJ and opp decert.
7/12/2016	MR	0.1	MS/MR/JF Review the task to compile data re hours worked in Kellogg's MF division to be used in the Response to Defendant's Motion to Decertify 0.1
7/12/2016	MS	0.1	MS/MR/JF Review the task to compile data re hours worked in Kellogg's MF division to be used in the Response to Defendant's Motion to Decertify 0.1
7/12/2016	MS	1	partial review of analysis of Kellogg testimony cites in decert brief
7/12/2016	JF	0.2	Send MS a link to the list of people Kellogg moved to dismiss due to bankruptcy proceedings 0.2
7/12/2016	MS	0.4	legal research for decert opp on bankruptcy issue
7/12/2016	JF	0.1	Send MS an excel spreadsheet with unpacked evidence re testimony used in Defendant's Motion to Decertify 0.1
7/12/2016	MR	0.5	create work folder and resource files for JK to pursue further investigation on SOL and job titles of opt-ins that Defendant moved to dismiss
7/12/2016	MR	0.2	briefly examine court orders docket 106 and 127

Date	Staff	Amount of Time	Description
7/12/2016	MR	0.4	JK/MR Review data that will be used to determine if Respondents assertions that certain Claimants are outside the statue of limitations of the case
7/12/2016	MR	0.2	MD/MR discuss tolling order and identify where order is in the docket
7/12/2016	MD	5	drafting summary judgment argument re outside sales exemption 5.0
7/12/2016	MD	0.2	MD/MR discuss tolling order and identify where order is in the docket
7/12/2016	JK	0.4	JK/MR Review data that will be used to determine if Respondents assertions that certain Claimants are outside the statue of limitations of the case
7/12/2016	JF	5.2	Review of evidence in the Defendant's SJ Motion 5.2
7/12/2016	MS	0.8	legal research for decert opp re Kellogg argument that no prima facie case for RSRs can be made
7/12/2016	MS	0.9	research for decert brief re Kellogg's claim that courts regulalry decertify
7/12/2016	MR	2.8	redo plaintiff SN and MF damages model to allow for tolling between 9/2/2013 and 10/4/2013
7/12/2016	MS	0.7	research for decert brief re Kellogg'sclaim that R23 standards apply at decert
7/12/2016	MS	1.7	drafting introduction to opposition and brief map
7/12/2016	KIM	0.7	Compile notes from defendants' filings to prepare arguments RE non-sales exemptions for opp MSJ and opp decert.
7/12/2016	JF	0.1	MS/MR/JF Review the task to compile data re hours worked in Kellogg's MF division to be used in the Response to Defendant's Motion to Decertify 0.1
7/12/2016	MR	0.8	MR/JF Review information related to hours worked in Kellogg's MF division to be used in the Response to Defendant's Motion to Decertify 0.8
7/12/2016	JF	0.2	MS/JF Discuss the tasks to 1. Compile a comprehensive list of MF plaintiffs 2. Analyze MF plaintiffs' testimony re hours worked 3. research evidence re bankruptcy/move to dismiss plaintiffs from the case Total Time: 0.2
7/12/2016	MS	0.2	MS/JF Discuss the tasks to 1. Compile a comprehensive list of MF plaintiffs 2. Analyze MF plaintiffs' testimony re hours worked 3. research evidence re bankruptcy/move to dismiss plaintiffs from the case Total Time: 0.2
7/13/2016	MD	5	drafting argument re outside sales exemption
7/13/2016	MR	0.2	MR/JF Discuss the next phase of the project re hours worked in the MF Division 0.2
7/13/2016	MR	1.2	use revised damages model to compute MF and SN week counts for opt-ins with testimony about hours 1.2
7/13/2016	KIM	0.2	Work on CF materials for finance co.
7/13/2016	JF	0.1	MD/JF Question re evidence used in the Defendant's Motion for SJ 0.1
7/13/2016	MD	0.1	MD/JF Question re evidence used in the Defendant's Motion for SJ 0.1
7/13/2016	MS	0.6	finishing outline of draft of brief IO decert
7/13/2016	MS	1.1	drafting introduction for rough draft of brief IO decert
7/13/2016	MS	1.2	drafting rough of similar factual and employment settings section
7/13/2016	KIM	0.5	Work on non-sales exempt argument for opp decert and opp msj
7/13/2016	MS	0.1	MS/MA meet to discuss project of preparing timeline of changes in morning foods from Reed depo in order to assist in responding to decertifictaion motion
7/13/2016	MS	1.7	drafting rough draft of similarly situated argument section
7/13/2016	MS	0.7	roughing out fact section for brief IO decert
7/13/2016	KIM	0.1	Work on CF materials for finance co.
7/13/2016	MA	0.1	MS/MA meet to discuss project of preparing timeline of changes in morning foods from Reed depo in order to assist in responding to decertifictaion motion
7/13/2016	JK	1.4	JK review validity regarding SOLdates in disputed plaintiffs worksheet produced by Defendants with 2 year limitation cut offs

Date	Staff	Amount of Time	Description
7/13/2016	JF	0.1	MS/JF Review the next phase of the project re hours worked in Kellogg's MF Division to support the claims in the response to the Defendant's Motion to Decertify 0.1
7/13/2016	AG	0.1	AG/JF Review the bankruptcy task (per MS's direction) 0.1
7/13/2016	AG	0.2	AG/JF Discuss the relevance of bankruptcy argument in Defendant's Motion to Decertify 0.2
7/13/2016	JF	2.3	Compile evidence for the Hours Worked in the MF Division 2.3
7/13/2016	JK	0.7	JK review validity regarding SOLdates in disputed plaintiffs worksheet produced by Defendants with 3 year limitation cut offs
7/13/2016	JF	0.1	Compose an email to MD with the completed review of the first half of the Defendant's Motion for Summary Judgment 0.1
7/13/2016	JK	2.4	JK begin to review one by one payroll history for 69 disputed plaintiffs with disputed job titles.
7/13/2016	MR	0.7	examine past emails and documents regarding disputed and excluded job titles .5, complete worksheet for JK .1, email to JK about same .1
7/13/2016	JK	0.2	JK/MR Review question regarding SOLdates in disputed plaintiffs worksheet produced by Defendants
7/13/2016	JF	0.1	Locate the bankruptcy spreadsheet with relevant plaintiff information for AG to review 0.1
7/13/2016	JF	0.2	MR/JF Discuss the next phase of the project re hours worked in the MF Division 0.2
7/13/2016	AG	0.2	conducted PACER search (ORDER granting in part and denying in part Motion for Summary Judgment;and Judgment in favor of the D. Goya Foods, Inc. d/b/a Goya Foods of Florida against the Plaintiff Jerry Robin Reyes)
7/13/2016	JK	0.2	JK/MR Review list of disputed job titles
7/13/2016	MS	0.1	MS/JF Review the next phase of the project re hours worked in Kellogg's MF Division to support the claims in the response to the Defendant's Motion to Decertify 0.1
7/13/2016	JF	2.1	Complete the task to unpack evidence in the Defendant's SJ motion 2.1
7/13/2016	MR	0.2	JK/MR Review list of disputed job titles
7/13/2016	JF	0.1	Compose an email to notify MS of the progress on the hours worked in the MF Division project 0.1
7/13/2016	MR	0.2	JK/MR Review question regarding SOLdates in disputed plaintiffs worksheet produced by Defendants
7/13/2016	AG	2.4	review documentation (Opt-in P. who did not disclose Bankruptcy Proceeding/amended disclosing)
7/13/2016	KIM	2.5	Research/review authorities for non-sales exemptions for opp decert and opp msj
7/13/2016	KIM	0.2	Work on non-sales exempt argument for opp decert and opp msj
7/13/2016	MS	1.1	legal research and application for brief IO decert
7/13/2016	MA	0.9	reviewing deposition transcript of Kim Reed to develop a timeline of the RSR/KSR position and identify the ways in which the position changed to assist MS in drafting decertification response
7/13/2016	MS	2.3	drafting rough of individual defenses section, addressing all of Kellogg's defenses
7/13/2016	JF	0.2	AG/JF Discuss the relevance of bankruptcy argument in Defendant's Motion to Decertify 0.2
7/13/2016	JF	0.1	AG/JF Review the bankruptcy task (per MS's direction) 0.1
7/13/2016	KIM	1.2	Work on non-sales exempt argument for opp decert and opp msj
7/13/2016	MS	1.1	drafting Morning Foods prima facie section of brief IO decert

Date	Staff	Amount of Time	Description
7/14/2016	JF	0.1	MS/JF Review of evidence re hours worked in MF Division of Kellogg to be used in the Reply to Defendant's Motion to Decertify 0.1
7/14/2016	MS	0.9	drafting section on individual damages
7/14/2016	MR	5	code each opt-in on the combined rogs spreadsheet for their MF and SN weeks .7, also code for whether they are on the testimony/citation spreadsheet .3, work on overall figures for rebuttal to Defendant's assertion about bonus % paid in their SJ class decert motion 1.5, perform analysis of bonus % paid per year to opt-ins 1.0, create grid for overall bonus payments per year .5, compose email to team about bonus % paid figures .2, investigate other ways to look at % change of bonus over time .8
7/14/2016	MS	1.1	redrafting section on meeting cert standard, including legal research, for brief IO decert
7/14/2016	MR	0.7	organize current work files and folders on lab computer and server .4, synchronize files .3
7/14/2016	MS	1.9	redrafting section on individualized defenses , including legal research, for brief IO decert
7/14/2016	JF	5.8	Compile evidence for the Hours Worked in the MF Division 5.8
7/14/2016	MR	0.3	MR/JF Discuss the strategy to best address the hours worked in the MF Division project to be used as evidence in the Reply to Defendant's Motion for Summary Judgment 0.3
7/14/2016	KIM	1	Work on non-sales exempt argument portions for opp decert and opp msj
7/14/2016	MS	1.3	drafting section on MF prima facia case, including legal research, for brief IO decert
7/14/2016	JF	0.3	MR/JF Discuss the strategy to best address the hours worked in the MF Division project to be used as evidence in the Reply to Defendant's Motion for Summary Judgment 0.3
7/14/2016	MS	0.1	MS/JF Review of evidence re hours worked in MF Division of Kellogg to be used in the Reply to Defendant's Motion to Decertify 0.1
7/14/2016	AG	0.4	review Judge courtesy copies of filing (Summary Judgment)
7/14/2016	MS	0.5	redrafting introduction for brief IO decert
7/14/2016	MA	3.1	reviewing deposition transcript of Kim Reed to develop a timeline of the RSR/KSR position and identify the ways in which the position changed to assist MS in drafting decertification response
7/14/2016	MS	0.5	drafting section on specific job duties for brief IO decert
7/14/2016	MS	2.1	drafting section on fairness and efficiency, including legal research, for brief IO decert
7/14/2016	JK	2.4	JK continue to review one by one payroll history for 69 disputed plaintiffs with disputed job titles.
7/14/2016	MD	6	drafting argument re outside sales exemption
7/14/2016	MR	1.1	continued work on Defendant SJ assertions about percentage of base pay
7/14/2016	JF	0.1	Compose an update email to MS re bankruptcy project 0.1
7/15/2016	JF	4.2	Compile evidence for the Hours Worked in the MF Division 4.2
7/15/2016	JK	0.5	JK/MR Meeting to discuss what was uncovered from investigating payroll history for disputed claimants
7/15/2016	KIM	1.8	Work on non-sales exempt arguments for opp msj
7/15/2016	MD	0.5	drafting argument re outside sales exemption 5.0
7/15/2016	MR	0.5	JK/MR Meeting to discuss what was uncovered from investigating payroll history for disputed claimants

Date	Staff	Amount of Time	Description
7/15/2016	MR	1.3	examine Kellogg assertion about named plaintiff compensation when employed in MF .2, compile actual figures re: assertion .9, compose detailed email to team about same .2
7/15/2016	JF	1.2	Review evidence used by the Defendants in the Motion for SJ 1.2
7/15/2016	JF	0.2	MR/JF Clarify the process by which to gather evidence for a number of ROGs not included in the ROGs Compiled Master spreadsheet 0.2
7/15/2016	MR	0.2	MR/JF Review the ROGs compiled spreadsheet to be used to compile evidence for the Hours Worked in the MF Division project 0.2
7/15/2016	MS	0.9	prepare and circulate first draft of brief IO decert for comment
7/15/2016	KIM	0.4	Work on non-sales exempt arguments for opp decert and opp MSJ
7/15/2016	MS	1.3	review and revise brief IO decert including additional legal research, Compose an email to MD re completion of the review of evidence in the Defendant's Motion for Summary Judgment 0.1
7/15/2016	MR	1.8	examine severance issue .3, investigate problem when base pay was categorized as bonuses 1.4, compose email to team regarding base pay as bonus problem .1
7/15/2016	MS	4.3	drafting fact section for opp to decert brief, including citations
7/15/2016	JF	0.1	MS/JF Clarify the coding of the information in the Hours Worked in the MF Division spreadsheet to be used in the Reply to Defendant's Motion to Decertify 0.1
7/15/2016	MR	0.2	MR/JF Clarify the process by which to gather evidence for a number of ROGs not included in the ROGs Compiled Master spreadsheet 0.2
7/15/2016	KIM	0.8	Work on non-sales exempt arguments for opp decert and opp msj
7/15/2016	JF	0.2	MR/JF Review the ROGs compiled spreadsheet to be used to compile evidence for the Hours Worked in the MF Division project 0.2
7/15/2016	JF	0.1	Sent an email to ME to clarify the number of plaintiff depositions taken in the case 0.1
7/15/2016	MR	0.1	read progress update email from JF regarding hours worked by MF opt-ins
7/15/2016	KIM	2.2	Work on non-sales exempt arguments for opp decert
7/15/2016	MS	0.1	MS/JF Clarify the coding of the information in the Hours Worked in the MF Division spreadsheet to be used in the Reply to Defendant's Motion to Decertify 0.1
7/15/2016	JK	1.1	JK review one by one payroll history for 12 additional disputed plaintiffs with disputed job titles.
7/15/2016	JF	0.3	Call from claimant re case update 0.3
7/15/2016	MR	0.1	compose email to team about underlining formula for named plaintiff bonuses
7/15/2016	KIM	0.8	Work on non-sales exempt arguments for opp decert and opp msj
7/15/2016	MR	0.4	compose email for progress update to team about critique of Defendant's motion to dismiss .1, create and include in email a draft list of exhibits as responses to Def's motion .3
7/15/2016	MR	1.6	investigate various approaches to handle base pay categorized as bonus problem .9, use exclusion of outliers approach .6, compose email to team about same .1
7/15/2016	JK	3.1	JK finish reviewing one by one payroll history for 69 disputed plaintiffs with disputed job titles.
7/16/2016	KIM	2	Work on opp decert non-sales arguments
7/16/2016	KIM	1	Work on opp decert non-sales arguments
7/16/2016	KIM	1.5	Work on opp MSJ non-sales arguments
7/16/2016	KIM	2	Work on opp decert non-sales arguments
7/16/2016	KIM	1.2	Work on opp MSJ non-sales arguments



Date	Staff	Amount of Time	Description
7/17/2016	KIM	2.2	Work on draft opp MSJ non-sales portion
7/17/2016	KIM	2.2	Work on draft opp decert non-sales portion
7/17/2016	KIM	2	Work on draft opp MSJ non-sales portion
7/17/2016	KIM	1	Work on draft opp decert non-sales portion
7/18/2016	JF	0.1	ME/JF Discuss the named plaintiffs' Chart project to be used in the preparation of the Reply to Defendant's Summary Judgment Motion 0.1
7/18/2016	KIM	0.6	MD/JF/KIM(in part)/MS(in part)/ME review status of plaintiffs' draft oppositions to defendants' summary judgment and decertification motions .4; determine steps needed to prepare exhibits .3
7/18/2016	MS	0.6	MD/JF/KIM(in part)/MS(in part)/ME review status of plaintiffs' draft oppositions to defendants' summary judgment and decertification motions .4; determine steps needed to prepare exhibits .3
7/18/2016	JK	0.8	JK/MR confer on excel workbook detailing disputed and agreed upon opt-ins as per Def motion to dismiss
7/18/2016	ME	0.3	JF/ME discuss formatting of chart containing named plaintiff testimony to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/18/2016	JK	0.2	JK/MR Phone call to discuss how to display different categories of disputed plaintiffs
7/18/2016	JF	0.7	MD/JF/KIM(in part)/MS(in part)/ME review status of plaintiffs' draft oppositions to defendants' summary judgment and decertification motions .4; determine steps needed to prepare exhibits .3
7/18/2016	MD	0.7	MD/JF/KIM(in part)/MS(in part)/ME review status of plaintiffs' draft oppositions to defendants' summary judgment and decertification motions .4; determine steps needed to prepare exhibits .3
7/18/2016	JK	0.2	JK/MR follow-up discussion about some details in excel workbook re: motion to dismiss
7/18/2016	JK	1.1	JK compare payroll history to payroll weeks to confirm exclusion assumptions by Defendant
7/18/2016	AG	0.2	AG/ME provide status of project to verify information provided by defense counsel about opt-in bankruptcy to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/18/2016	JF	0.3	JF/ME discuss formatting of chart containing named plaintiff testimony to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/18/2016	JK	0.6	JK Tidy up worksheet displaying categories of disputed plaintiffs
7/18/2016	MR	0.2	JK/MR Phone call to discuss how to display different categories of disputed plaintiffs
7/18/2016	MR	0.4	review and edit JK's work on disputed opt-ins with regard to Defendant motion to dismiss
7/18/2016	MR	0.1	JK/MR Phone call to discuss results of payroll history to payroll weeks in regards to disputed plaintiffs
7/18/2016	JK	0.1	JK/MR Phone call to discuss results of payroll history to payroll weeks in regards to disputed plaintiffs
7/18/2016	ME	0.1	ME/JF Discuss the named plaintiffs' Chart project to be used in the preparation of the Reply to Defendant's Summary Judgment Motion 0.1
7/18/2016	KIM	1.7 (0.4).	Review draft opp MSJ & write comments on hard copy (1.3) draft email to MD & MS
7/18/2016	ME	0.3	verify the number of plaintiff depositions that were taken to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/18/2016	MD	4	drafting argument re MN and WA meal/break claims and AZ/KY judgment on the pleadings 4.0

Date	Staff	Amount of Time	Description
7/18/2016	MR	0.1	JF/MR confer on project examining rogs for MF opt-in statements of work hours
7/18/2016	JF	4.7	Compile Named Plaintiffs Testimony in preparation for the Reply to Defendant's Summary Judgment Motion 4.7
7/18/2016	ME	0.7	MD/JF/KIM(in part)/MS(in part)/ME review status of plaintiffs' draft oppositions to defendants' summary judgment and decertification motions .4; determine steps needed to prepare exhibits .3
7/18/2016	ME	0.2	ME/JF Meet to discuss Kellogg case updates 0.2
7/18/2016	JF	0.1	Call to ME re the status of the bankruptcy review task 0.1
7/18/2016	JF	0.1	JF/MR confer on project examining rogs for MF opt-in statements of work hours
7/18/2016	MD	3	drafting summary judgment opposition 3.0
7/18/2016	JF	0.2	ME/JF Meet to discuss Kellogg case updates 0.2
7/18/2016	KIM	0.4	Copy paper notes for time entry to Time Matters from weekend.
7/18/2016	JK	0.7	JK Comile a breakdown of different groups of disputed plaintiffs based upon Defendants exclusion reasoning
7/18/2016	ME	2	compile named plaintiff testimony to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/18/2016	KIM	1.3	Take notes on additional cases for opp MSJ and opp decert
7/18/2016	ME	0.2	AG/ME provide status of project to verify information provided by defense counsel about opt-in bankruptcy to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/19/2016	KIM	1.2	Addtnl research for authorities on manual labor & relation to exemptions
7/19/2016	MD	8	revising fact section for summary judgment briefing 8.0
7/19/2016	ME	5.9	compile named plaintiff testimony to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/19/2016	ME	0.1	email opt-in link to website updates
7/19/2016	MD	0.3	discuss opposition summary judgment arguments re outside sales exemption 0.3
7/19/2016	KIM	0.3	md/ms/kw discuss refining of summary judgment opposition arguments, including revisions to fact section to address Kellogg's material facts 0.4
7/19/2016	KIM	0.2	Westlaw research for opp MSJ
7/19/2016	JF	6.3	Compile Named Plaintiffs Testimony in preparation for the Reply to Defendant's Summary Judgment Motion 6.3
7/19/2016	KIM	0.8	Begin edits for non-sales exempt portion of draft opp sj
7/19/2016	MS	0.3	discuss opposition summary judgment arguments re outside sales exemption 0.3
7/19/2016	ME	0.2	telephone call from opt-in for case update
7/19/2016	ME	0.5	search bates documents and emails produced by defense counsel to locate job descriptions to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/19/2016	ME	0.2	telephone call with opt-in for case update
7/19/2016	KIM	0.7	Compile notes about relationship between manual labor & exemption
7/19/2016	KIM	0.5	Read materials about relationship between manual labor & exemption
7/19/2016	MS	1.1	review Plaintiffs duties and incorporate into job duties sections
7/19/2016	KIM	0.4	Review cases for opp decert
7/19/2016	KIM	0.1	Westlaw research on relationship between manual labor & exemption
7/19/2016	MS	0.9	drafting section on sales duties that Plaintiffs don't have including legal research

Date	Staff	Amount of Time	Description
7/19/2016	KIM	0.4	md/ms/kw discuss refining of summary judgment opposition arguments, including revisions to fact section to address Kellogg's material facts 0.4
7/19/2016	KIM	0.4	Read sources about relationship between manual labor & exemptions
7/19/2016	MS	0.3	md/ms/kw discuss refining of summary judgment opposition arguments, including revisions to fact section to address Kellogg's material facts 0.4
7/19/2016	MD	0.4	md/ms/kw discuss refining of summary judgment opposition arguments, including revisions to fact section to address Kellogg's material facts 0.4
7/19/2016	MS	0.4	md/ms/kw discuss refining of summary judgment opposition arguments, including revisions to fact section to address Kellogg's material facts 0.4
7/19/2016	KIM	0.4	Review draft opp sj
7/19/2016	MS	3.3	drafting section on non-sales duties, including legal research
7/19/2016	KIM	0.6	Read sources about relationship between manual labor & exemptions
7/19/2016	KIM	0.2	Westlaw research about relationship between manual labor & exemptions
7/19/2016	KIM	0.4	Review draft opp decert
7/20/2016	MD	7	revise facts for summary judgment briefing 7.0
7/20/2016	ME	0.1	email MD about most recently received opt-in discovery responses
7/20/2016	MD	0.2	call counsel from McCartt case re summary judgment 0.2
7/20/2016	JF	4.6	Compile Named Plaintiffs Testimony in preparation for the Reply to Defendant's Summary Judgment Motion 4.6
7/20/2016	KIM	0.3	Draft email to MS & MD re arguments/portions of opp decert and opp MSJ briefs
7/20/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#404 - ORDER granting [398] Plaintiffs' Motion to Seal Exhibits 3, 7, 10, 11, 16, 19, 20, 21, 22, 25, 26, 27, 29, 30, 33, 44, 54, 55, 57 and 58 to Plaintiffs Motion for Partial Summary Judgment [397]; signed by Judge Ronald B. Leighton.(DN)
7/20/2016	KIM	1	work on combination exemption argument
7/20/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#403 - ORDER granting [401] Plaintiffs' Motion to Seal Exhibits 3, 4, 5, 9, and 10 to Plaintiffs Motion to Certify State Law Class Actions [392]; signed by Judge Ronald B. Leighton.(DN)
7/20/2016	ME	3.9	compile named plaintiff testimony to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/20/2016	KIM	0.4	Organize case files
7/20/2016	MS	7.3	incorporating ET comments into decert brief
7/20/2016	ME	0.6	use defendants' decertification exhibits to locate plaintiffs' rogs for attorney to review
7/20/2016	MD	0.1	email KW about administrative section summary judgment argument 0.1
7/20/2016	MD	1	staff meeting 1.0
7/21/2016	ME	2.5	create list of exhibits needed for plaintiffs' opposition to defendants' decertification motion .9; compile exhibits for plaintiffs' opposition to defendants' decertification motion 1.6
7/21/2016	KIM	0.8	Work on refining non-sales arguments in opp SJ
7/21/2016	KIM	0.3	Work on refining non-sales arguments in opp SJ
7/21/2016	JF	0.1	Call from claimant re the case update 0.1
7/21/2016	MD	2	drafting summary judgment section on plaintiffs not working in covered position and outside the statute of limitations
7/21/2016	ME	0.7	locate and enter plaintiffs' employment end date into bankruptcy tracking spreadsheet to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion

Date	Staff	Amount of Time	Description
7/21/2016	MS	2.3	review and revise argument on primary duty factors in brief IO sj, including legal research
7/21/2016	MS	0.6	review and revise McCartt argument, including legal research
7/21/2016	MS	1	review and revise Ackerman argument, including legal research
7/21/2016	MS	1.1	review and revise argument on external inidicia factors in brief IO sj, including legal research
7/21/2016	ME	0.2	MS/ME discuss tasks needed to complete for plaintiffs' oppositions to defendants' summary judgment and decertification motions
7/21/2016	MS	0.2	MS/ME discuss tasks needed to complete for plaintiffs' oppositions to defendants' summary judgment and decertification motions
7/21/2016	KIM	0.6	Work on refining non-sales arguments in opp SJ
7/21/2016	MD	4	drafting opposition brief section on bankruptcy to summary judgment 4.0
7/21/2016	JF	0.2	Call from claimant re the case update 0.2
7/21/2016	MS	0.4	tc w/ ET re decert opposition
7/21/2016	MS	0.7	review and revise Christopher argument, including legal research
7/21/2016	MS	0.3	MS MD KW meet to discuss opp MtD
7/21/2016	MD	0.3	MS MD KW meet to discuss opp MtD
7/21/2016	KIM	0.3	MS MD KW meet to discuss opp MtD
7/21/2016	JS	0.1	convert copy-protected website to pdf for ease of quoting materials using MS Word/copy and paste
7/21/2016	ME	0.2	telephone call with opt-in for case update
7/22/2016	MS	0.3	drafting rider for willfulness issue for brief IO sj
7/22/2016	AN	0.4	Pick up color copies of material for Summary Judgement packet from copy center
7/22/2016	MS	1.1	drafting rider for Bankruptcy issue for brief IO sj
7/22/2016	MD	0.2	md/kw discussing timing re completing briefing for summary judgment argument 0.2
7/22/2016	MS	3.5	drafting rider for non-sales white collar defenses for brief IO sj
7/22/2016	ME	0.2	MS/ME review discussing bankruptcy issue defendants' raised in summary judgment motion with clients
7/22/2016	MS	0.5	drafting rider for liquiudated damages issue for brief IO sj
7/22/2016	ME	0.2	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	JF	0.2	JF/ME discuss project of verifying Kellogg's data regarding opt-in SOL exclusion to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/22/2016	JF	0.1	MS/JF Task to review the Defendants' Answers to complaints (Docket) to check the accuracy of our assertions in our Reply to Defendant's Summary Judgment 0.1
7/22/2016	KIM	0.2	md/kw discussing timing re completing briefing for summary judgment argument 0.2
7/22/2016	MS	0.5	drafting rider for KY/AZ claims
7/22/2016	ME	0.2	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	KIM	3.5	Assist with finishing draft of opp sum j brief
7/22/2016	ME	0.2	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	KIM	1.8	Review opp sum j draft
7/22/2016	KIM	2.1	Review opp sum j draft

Date	Staff	Amount of Time	Description
7/22/2016	JF	1.8	Check on dates re last date of employment for the purposes of our reply to Defendant's Summary Judgment Motion 1.8
7/22/2016	ME	0.1	send email to opt-in informing them of bankruptcy issue raised by defendants in their summary judgment motion
7/22/2016	MS	0.1	MS/JF Task to review the Defendants' Answers to complaints (Docket) to check the accuracy of our assertions in our Reply to Defendant's Summary Judgment 0.1
7/22/2016	MS	0.2	MS/ME review discussing bankruptcy issue defendants' raised in summary judgment motion with clients
7/22/2016	CLER	0.5	prepare mailing of courtesy copy to court (certification/SJ)
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	email MD about opt-in's question about status in the case
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.2	email MS about list of opt-ins to contact regarding bankruptcy issue presented by defendants in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	1.9	review opt-in data to determine if opt-ins on defendants' bankruptcy list have completed discovery and/or if they fall within the SOL to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	JF	0.2	Review the Defendants' Answers to complaints (Docket) to check the accuracy of our assertions in our Reply to Defendant's Summary Judgment 0.2
7/22/2016	ME	0.1	MD/ME review project needed to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	MD/ME review project needed to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/22/2016	MD	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion

Date	Staff	Amount of Time	Description
7/22/2016	ME	0.1	telephone call from opt-in with questions about bankruptcy issue raised by defendants' in their summary judgment motion
7/22/2016	ME	0.2	JF/ME discuss project of verifying Kellogg's data regarding opt-in SOL exclusion to assist attorneys with plaintiffs' opposition to defendants' summary judgment motion
7/24/2016	MR	1.3	work on draft declaration and exhibits for response to Defendant's motion to dismiss
7/25/2016	MS	2.2	incorporate and rewrite brief IO decert based on ET comments
7/25/2016	MS	0.3	evaluate motion for additional pages for brief IO dj
7/25/2016	MS	2.7	redrafting legal argument in brief IO sj based on ET comments
7/25/2016	JF	0.2	Write a brief summary (email) for the case attorneys about the conversation with the claimant re recent workload changes 0.2
7/25/2016	JF	0.3	Call from claimant re recent workload responsibilities changes 0.3
7/25/2016	MS	0.2	MS/ME discuss edits for draft Plaintiffs' brief in opposition to defendants' motion to decertify FLSA collective action
7/25/2016	KIM	1	Review opp sum j feedback from Ed
7/25/2016	MD	0.2	ms/md discuss ET comments and strategy moving forward
7/25/2016	ME	0.2	JF/ME discuss location of information needed to assist attorneys with verifying defendant data for plaintiffs' opposition to summary judgment motion
7/25/2016	JF	0.2	Call from claimant re case update 0.2
7/25/2016	MS	0.2	emails w/ ET re revisions to fact section of brief
7/25/2016	MS	0.2	ms/md discuss ET comments and strategy moving forward
7/25/2016	ME	0.2	MS/ME discuss edits for draft Plaintiffs' brief in opposition to defendants' motion to decertify FLSA collective action
7/25/2016	JF	0.2	Call to claimant re case update 0.2
7/25/2016	ME	3.1	work on formatting brief for plaintiffs' opposition to defendants' decertification motion
7/25/2016	JF	2.9	Compile an hours worked chart with MF opt-ins to use as an exhibit in the Reply to Defendant's Motion to Decertify 2.9
7/25/2016	KIM	0.2	File emails from previous week
7/25/2016	JF	0.1	Update the central Case Update spreadsheet 0.1
7/25/2016	ME	0.1	ME/JF Confer re the case update to be included on the central Case Update spreadsheet 0.1
7/25/2016	ME	0.1	ME/JF Clarify job titles/designations within Kellogg 0.1
7/25/2016	KIM	1.5	Review opp decert draft (.5), earlier draft of portion (.5), revise earlier draft portion (.5)
7/25/2016	ME	0.1	ME/JF Review the project to assemble exhibits to prepare to file the reply to the Defendant's Motion to Decertify 0.1
7/25/2016	JF	0.1	ME/JF Confer re the case update to be included on the central Case Update spreadsheet 0.1
7/25/2016	JF	0.1	ME/JF Clarify job titles/designations within Kellogg 0.1
7/25/2016	MR	0.2	MR/JF Discuss the inclusion of the claimant listed as excluded under the 3-year FLSA claim designation 0.2
7/25/2016	JF	0.1	ME/JF Review the project to assemble exhibits to prepare to file the reply to the Defendant's Motion to Decertify 0.1
7/25/2016	JF	0.2	MR/JF Discuss the inclusion of the claimant listed as excluded under the 3-year FLSA claim designation 0.2
7/25/2016	ME	0.4	draft email to MS about responding to opt-in questions about bankruptcy issue raised by defendants in their summary judgment motion



Date	Staff	Amount of Time	Description
7/25/2016	JF	0.2	JF/ME discuss location of information needed to assist attorneys with verifying defendant data for plaintiffs' opposition to summary judgment motion
7/25/2016	JF	0.1	Review the case update to be included in the central Case Update spreadsheet for the purposes of the paralegal review 0.1
7/25/2016	MR	2.1	work on draft declaration and exhibits for response to Defendant's motion to dismiss
7/26/2016	AN	0.2	Telephone call from plaintiff inquiring about any new decisions with regard to his claim
7/26/2016	MS	1.1	review and revise fact section on brief io sj
7/26/2016	MS	2.6	revising brief IO sj argument section to address and incorporate et comments
7/26/2016	JF	4.6	Compile an hours worked chart with MF opt-ins to use as an exhibit in the Reply to Defendant's Motion to Decertify 4.6
7/26/2016	JF	2.1	Finalize the hours worked in the MF Division exhibit to be used in the reply to Defendant's Motion to decertify 2.1
7/26/2016	MS	0.2	review of comments on brief io decert
7/26/2016	MA	3.5	proofreading argument section of response to Kellogg's motion for summary judgment
7/26/2016	MS	0.1	ms/me discuss process for people with bankruptcy issues
7/26/2016	ME	0.1	ms/me discuss process for people with bankruptcy issues
7/26/2016	MS	0.9	review and revise fact section in brief io sj and combine into draft for et review
7/26/2016	ME	0.3	ms/me discuss formatting of brief io decert
7/26/2016	MS	0.3	ms/me discuss formatting of brief io decert
7/26/2016	KIM	1.7	Research for section of opp sj brief
7/26/2016	MS	0.3	draft email to bkrptcy Plaintiffs re seeking advice from counsel
7/26/2016	ME	8.7	work on formatting brief and creating table of authorities for plaintiffs' opposition to defendants' decertification motion
7/26/2016	KIM	0.8	Write-up research for section of opp sj brief
7/26/2016	ME	0.5	reply to client emails about bankruptcy issues
7/26/2016	KIM	0.4	Brief research for filings due 7/29
7/27/2016	ME	0.1	ME/JF Consult with ME re tasks to be done in order to get ready to file replies to the dispositive motions in the case 0.1
7/27/2016	MS	1.4	drafting motion to seal for brief IO decert, including exhibits, order and cert
7/27/2016	JF	5.8	Fill in citation details in the draft of the SJ Motion to be submitted to the court on 7/18/16 5.8
7/27/2016	ME	4.2	work on preparing exhibits for plaintiffs' opposition to defendants' decertification motion
7/27/2016	ME	0.4	MR/ME review best program to use for highlighting exhibits for plaintiffs' opposition to defendants' decertification motion
7/27/2016	MR	0.1	MR/JF Consult MR to review the statistical information re hours worked in the MF Division to be used in the Reply to the Defendant's Motion to Decertify 0.1
7/27/2016	JF	0.1	MS/JF Review the statistical information re hours worked in the MF Division to be included in the Reply to the Defendant's Motion to Decertify 0.1
7/27/2016	MD	0.1	MD/JF Review the task to edit/review citations in the Reply to Defendant's SJ Motion 0.1
7/27/2016	ME	1	work on labeling exhibits in brief in opposition to defendants' decertification motion
7/27/2016	JF	0.1	MD/JF Review the task to edit/review citations in the Reply to Defendant's SJ Motion 0.1
7/27/2016	ME	4	work on formatting brief and creating table of authorities for plaintiffs' opposition to defendants' decertification motion

Date	Staff	Amount of Time	Description
7/27/2016	MS	1.3	revising fact section of brief and proofing argument
7/27/2016	MS	2.2	drafting declaration in support of brief io decert
7/27/2016	MS	0.5	revisions to fact section of brief io sj
7/27/2016	MS	0.3	drafting intro to brief io dj
7/27/2016	JF	0.1	MR/JF Consult MR to review the statistical information re hours worked in the MF Division to be used in the Reply to the Defendant's Motion to Decertify 0.1
7/27/2016	MS	2.4	incorporating co counsel comments on brief io sj
7/27/2016	JF	0.1	ME/JF Consult with ME re tasks to be done in order to get ready to file replies to the dispositive motions in the case 0.1
7/27/2016	JF	0.1	Compose an email to MS with revised statistical information re hours worked in the MF Division 0.1
7/27/2016	MS	0.1	MS/JF Review the statistical information re hours worked in the MF Division to be included in the Reply to the Defendant's Motion to Decertify 0.1
7/27/2016	MR	0.4	MR/ME review best program to use for highlighting exhibits for plaintiffs' opposition to defendants' decertification motion
7/28/2016	MS	1.4	drafting motion to seal, certification, and proposed order ISO brief IO decert draft MS declaration in support of plaintiffs' opposition to defendants' decertification
7/28/2016	ME	2.5	motion
7/28/2016	JF	8.6	Prepare exhibits to file with the Reply to the Defendant's Motion for SJ 8.6
7/28/2016	ME	1	make final edits to plaintiffs' opposition to defendants' decertification motion
7/28/2016	ME	3	locate exhibits to support facts in plaintiffs' opposition to defendants' summary judgment motion
7/28/2016	MS	0.3	MS/ME review process for drafting declaration for plaintiffs' opposition to defendants' decertification motion
7/28/2016	ME	0.3	MS/ME review process for drafting declaration for plaintiffs' opposition to defendants' decertification motion
7/28/2016	MS	1.9	designating exhibits for filing under seal and revising declaration
7/28/2016	MS	0.3	incorporating Subit comments into brief IO decert
7/28/2016	MA	0.1	redacting confidential information from updated response to motion to decertify
7/28/2016	ME	0.2	MR/ME review process for compile last day worked dates for particular opt-ins to assist attorneys with opposition to defendants' summary judgment motion
7/28/2016	ME	1.4	compile last day worked for particular opt-ins to assist attorneys with summary judgment motion
7/28/2016	MR	0.2	MR/ME review process for compile last day worked dates for particular opt-ins to assist attorneys with opposition to defendants' summary judgment motion
7/28/2016	MA	0.1	redacting confidential information from motion to decertify
7/29/2016	MD	0.4	MD/ME file plaintiffs' opposition to defendants' summary judgment motion
7/29/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Document#410 - REQUEST by Defendants Kellogg Company, Kellogg Sales Company for Judicial Notice in Support of Opposition to Plaintiffs' Motion to Certify Class re [409] Declaration, [408] Response to Motion (Nelson, James))
7/29/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Document#409 - DECLARATION of James M. Nelson in Support of Defendants' Opposition to Plaintiffs' Motion to Certify State Law Class Actions filed by Defendants Kellogg Company, Kellogg Sales Company re [400] MOTION to Certify Class (Attachments: # (1) Exhibit 1-16, Part 1, # (2) Exhibit 1-16, Part 2)(Nelson, James))
7/29/2016	MS	0.4	drafting conclusion for brief io sj
7/29/2016	MA	0.2	editing conclusion of response to Kellogg's motion for summary judgment

Date	Staff	Amount of Time	Description
7/29/2016	JS	0.7	create exhibit cover pages for add'l exhibits
7/29/2016	ME	0.2	telephone call with opt-in for case update
7/29/2016	JS	0.2	compress files for ECF filing
			Transfer documents recd from ECF system to docket file and create file copy (Document#407 - UNREDACTED SEALED [405] Response to Motion, , , , , , , [406] MOTION to Seal , by Plaintiff Patty Thomas (Attachments: # (1) Exhibit 4 Master Sales Contract CONFIDENTIAL, # (2) Exhibit 7 Publix Business Review CONFIDENTIAL, # (3) Exhibit 9 Contracts CONFIDENTIAL, # (4) Exhibit 10 KMF Funds CONFIDENTIAL, # (5) Exhibit 11 DSD Benefits CONFIDENTIAL, # (6) Exhibit 13 CONFIDENTIAL 2006 TM Study, # (7) Exhibit 14 CONFIDENTIAL 2008 TM Study, # (8) Exhibit 15 2010 RSR Study Holton 27 - CONFIDENTIAL, # (9) Exhibit 16 CONFIDENTIAL Willard Bishop Study, # (10) Exhibit 18 Willard Bishop Engagement Letter CONFIDENTIAL, # (11) Exhibit 19 242862 - CONFIDENTIAL - Syracuse Itinerary, # (12) Exhibit 21 Workload Model Holton Ex 33, # (13) Exhibit 22 CONFIDENTIAL 2008 Labor Budgeting., # (14) Exhibit 24 Motus BSN 330959.
7/29/2016	CLER	0.1	CONFIDENTIAL, # (15) Exhibit 36 Merchandising [questions] Results) (Sweeney, Michael)
7/29/2016	JF	10.4	Prepare exhibits to file with the Reply to the Defendant's Summary Judgment 10.4
			Transfer documents recd from ECF system to docket file and create file copy (Document#408 - RESPONSE, by Defendants Kellogg Company, Kellogg Sales Company, to
7/29/2016	CLER	0.1	[400] MOTION to Certify Class . Oral Argument Requested. (Nelson, James)
7/29/2016	ME	0.4	MD/ME file plaintiffs' opposition to defendants' summary judgment motion
			ECF Filing of UNREDACTED SEALED [405] Response to Motion, [406] MOTION to Seal Attachments: # (1) Exhibit 4 Master Sales Contract CONFIDENTIAL, # (2) Exhibit 7 Publix Business Review CONFIDENTIAL, # (3) Exhibit 9 Contracts CONFIDENTIAL, # (4) Exhibit 10 KMF Funds CONFIDENTIAL, # (5) Exhibit 11 DSD Benefits CONFIDENTIAL, # (6) Exhibit 13 CONFIDENTIAL 2006 TM Study, # (7) Exhibit 14 CONFIDENTIAL 2008 TM Study, # (8) Exhibit 15 2010 RSR Study Holton 27 - CONFIDENTIAL, # (9) Exhibit 16 CONFIDENTIAL Willard Bishop Study, # (10) Exhibit 18 Willard Bishop Engagement Letter CONFIDENTIAL, # (11) Exhibit 19 242862 - CONFIDENTIAL - Syracuse Itinerary, # (12) Exhibit 21 Workload Model Holton Ex 33, # (13) Exhibit 22 CONFIDENTIAL 2008 Labor Budgeting., # (14) Exhibit 24 Motus BSN 330959. CONFIDENTIAL, # (15) Exhibit 36
7/29/2016	AG	0.4	Merchandising [questions] Results)
7/29/2016	AN	0.2	MD/AN File Motion to Seal
			ECF Filing of MOTION to Seal . (Attachments: # (1) Declaration of Michael J.D. Sweeney in Support of Plaintiffs Motion to File Documents Under Seal, # (2) Proposed Order) Noting
7/29/2016	CLER	0.1	Date 8/12/2016,
7/29/2016	MS	1.6	preparing briefs, motion, and supportng docs io decert

Date	Staff	Amount of Time	Description
			ECF Filing of RESPONSE to [392] MOTION To Decertify FLSA Collective Action . Oral Argument Requested. (Attachments: # (1) Declaration of Michael J.D.Sweeney in Support of Plaintiffs Brief in Opposition to Defendants Motion to Decertfy FLSA Collective Action, # (2) Exhibit 1 Bussell Dep, # (3) Exhibit 2 Holton Dep, # (4) Exhibit 3 Salmon Dep, # (5) Exhibit 4 Master Sales Contract CONFIDENTIAL, # (6) Exhibit 5 Reed Dep, # (7) Exhibit 6 Kelly Dep, # (8) Exhibit 7 Publix Business Review CONFIDENTIAL, # (9) Exhibit 8 Bussell Dep, # (10) Exhibit 9 Contracts CONFIDENTIAL, # (11) Exhibit 10 KMF Funds CONFIDENTIAL, # (12) Exhibit 11 DSD Benefits CONFIDENTIAL, # (13) Exhibit 12 Pennington Dep, # (14) Exhibit 13 CONFIDENTIAL 2006 TM Study, # (15) Exhibit 14 CONFIDENTIAL 2008 TM Study, # (16) Exhibit 15 2010 RSR Study Holton 27 - CONFIDENTIAL, # (17) Exhibit 16 CONFIDENTIAL Willard Bishop Study, # (18) Exhibit 17 Groulx Dep, # (19) Exhibit 18 Willard Bishop Engagement Letter CONFIDENTIAL, # (20) Exhibit 19 242862 - CONFIDENTIAL - Syracuse Itinerary, # (21) Exhibit 20 Johnson Itinerary, # (22) Exhibit 21 Workload Model Holton Ex 33, # (23) Exhibit 22 CONFIDENTIAL 2008 Labor Budgeting, # (24) Exhibit 23 Job Duty Deposition Testimony Summary, # (25) Exhibit 24 Motus BSN 330959. CONFIDENTIAL, # (26) Exhibit 25 Crowell Written Warning KELLOGG-OPT-IN-EMAIL-075705, # (27) Exhibit 26 Gibson Dep, # (28) Exhibit 27 Hoak Dep, # (29) Exhibit 28 McWell Dep, # (30) Exhibit 29 Sales Account Team Email - Holton Exhibit 17, # (31) Exhibit 30 Young Dep, # (32) Exhibit 31 29378 ltr re new sync requirements for TMs, # (33) Exhibit 32 59983-060065-Handheld user manual 2009, # (34) Exhibit 33 Email Syncing Policy and Discipline KELLOGG-OPT-IN-EMAIL-321833-321834, # (35) Exhibit 34 Account Team Email - Ex. 3 Holton, # (36) Exhibit 35 Emails Directing Orders, # (37) Exhibit 36 Merchandising [questions] Results, # (38) Exhibit 37 Perteete Dep, # (39) Exhibit 38 Nilles Dep, # (40) Exhibit 39 Kivett Dep, # (41) Exhibit 40
7/29/2016	AG	0.5	Workwi
7/29/2016	MS	1.1	finalizing motion to seal and cert iso

Date	Staff	Amount of Time	Description
			Transfer documents recd from ECF system to docket file and create file copy (Document#405 - RESPONSE, by Plaintiff Patty Thomas, to [392] MOTION To Decertify FLSA Collective Action . Oral Argument Requested. (Attachments: # (1) Declaration of Michael J.D.Sweeney in Support of Plaintiffs Brief in Opposition to Defendants Motion to Decertfy FLSA Collective Action, # (2) Exhibit 1 Bussell Dec, # (3) Exhibit 2 Holton Dep, # (4) Exhibit 3 Salmon Dep, # (5) Exhibit 4 Master Sales Contract CONFIDENTIAL, # (6) Exhibit 5 Reed Dep, # (7) Exhibit 6 Kelly Dep, # (8) Exhibit 7 Publix Business Review CONFIDENTIAL, # (9) Exhibit 8 Bussell Dep, # (10) Exhibit 9 Contracts CONFIDENTIAL, # (11) Exhibit 10 KMF Funds CONFIDENTIAL, # (12) Exhibit 11 DSD Benefits CONFIDENTIAL, # (13) Exhibit 12 Pennington Dep, # (14) Exhibit 13 CONFIDENTIAL 2006 TM Study, # (15) Exhibit 14 CONFIDENTIAL 2008 TM Study, # (16) Exhibit 15 2010 RSR Study Holton 27 - CONFIDENTIAL, # (17) Exhibit 16 CONFIDENTIAL Willard Bishop Study, # (18) Exhibit 17 Groulx Dep, # (19) Exhibit 18 Willard Bishop Engagement Letter CONFIDENTIAL, # (20) Exhibit 19 242862 - CONFIDENTIAL - Syracuse Itinerary, # (21) Exhibit 20 Johnson Itinerary, # (22) Exhibit 21 Workload Model Holton Ex 33, # (23) Exhibit 22 CONFIDENTIAL 2008 Labor Budgeting, # (24) Exhibit 23 Job Duty Deposition Testimony Summary, # (25) Exhibit 24 Motus BSN 330959. CONFIDENTIAL, # (26) Exhibit 25 Crowell Written Warning KELLOGG-OPT-IN-EMAIL-075705, # (27) Exhibit 26 Gibson Dep, # (28) Exhibit 27 Hoak Dep, # (29) Exhibit 28 McWell Dep, # (30) Exhibit 29 Sales Account Team Email - Holton Exhibit 17, # (31) Exhibit 30 Young Dep, # (32) Exhibit 31 29378 ltr re new sync requirements for TMs, # (33) Exhibit 32 59983-060065-Handheld user manual 2009, # (34) Exhibit 33 Email Syncing Policy and Discipline KELLOGG-OPT-IN-EMAIL-321833-321834, # (35) Exhibit 34 Account Team Email - Ex. 3 Holton, # (36) Exhibit 35 Emails Directing Orders, # (37) Exhibit 36 Merchandising [questions] Results, # (38) Exhibit 37
7/29/2016	CLER	0.4	Perteete Dep, # (39)
7/29/2016	AG	0.8	prepare exhibits for ECF filing (brief in opposition to decertification)
7/29/2016	MD	0.2	MD/AN File Motion to Seal
			Check on examples of anyone making commission < 1/3 of their pay pre April 2011 .3,
7/29/2016	MR	0.4	send results to atty MD .1
7/29/2016	ME	10.1	prepare exhibits for plaintiffs' opposition to defendants' summary judgment motion
			Transfer documents recd from ECF system to docket file and create file copy (Document#406 - MOTION to Seal by Plaintiff Patty Thomas. (Attachments: # (1) Declaration of Michael J.D. Sweeney in Support of Plaintiffs Motion to File Documents
7/29/2016	CLER	0.2	Under Seal, # (2) Proposed Order) Noting Date 8/12/2016, (Sweeney, Michael) creating exhibit cover pages to assist paralegals in preparing exhibits for response to
7/29/2016	MA	0.2	Kellogg's motion for summary judgment
8/1/2016	MS	0.3	address issues re sealed filing and K accessq
8/1/2016	ME	0.1	leave voicemail for opt-in to follow up about bankruptcy issue
8/1/2016	ME	0.1	leave voicemail for opt-in to follow up about case update

Date	Staff	Amount of Time	Description
8/1/2016	AG	1.4	<p>prepare courtesy copies of filing for court (Docket#415 - RESPONSE, by Plaintiff Patty Thomas, to [394] MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment. Oral Argument Requested. (Attachments: # (1) Declaration, # (2) Exhibit 1, # (3) Exhibit 2, # (4) Exhibit 3, # (5) Exhibit 4, # (6) Exhibit 5-1, # (7) Exhibit 5-1, # (8) Exhibit 6, # (9) Exhibit 7, # (10) Exhibit 8, # (11) Exhibit 9, # (12) Exhibit 10, # (13) Exhibit 11, # (14) Exhibit 12, # (15) Exhibit 13-1, # (16) Exhibit 13-2, # (17) Exhibit 14, # (18) Exhibit 15, # (19) Exhibit 16, # (20) Exhibit 17, # (21) Exhibit 18, # (22) Exhibit 19, # (23) Exhibit 20, # (24) Exhibit 21, # (25) Exhibit 22, # (26) Exhibit 23, # (27) Exhibit 24, # (28) Exhibit 25, # (29) Exhibit 26, # (30) Exhibit 27, # (31) Exhibit 28, # (32) Exhibit 29, # (33) Exhibit 30, # (34) Exhibit 32, # (35) Exhibit 34, # (36) Exhibit 35, # (37) Exhibit 36, # (38) Exhibit 37, # (39) Exhibit 38, # (40) Exhibit 39, # (41) Exhibit 40, # (42) Exhibit 42, # (43) Exhibit 43, # (44) Exhibit 44, # (45) Exhibit 45, # (46) Exhibit 46, # (47) Exhibit 47, # (48) Exhibit 48, # (49) Exhibit 49, # (50) Exhibit 50, # (51) Exhibit 51, # (52) Exhibit 52, # (53) Exhibit 54, # (54) Exhibit 55, # (55) Exhibit 56, # (56) Exhibit 57, # (57) Exhibit 58, # (58) Exhibit 59, # (59) Exhibit 60, # (60) Exhibit 61, # (61) Exhibit 62, # (62) Exhibit 63, # (63) Exhibit 64, # (64) Exhibit 65, # (65) Exhibit 66, # (66) Declaration)(</p>
8/1/2016	AG	1.5	<p>prepare courtesy copies of filing for court (Docket#405 - RESPONSE, by Plaintiff Patty Thomas, to [392] MOTION To Decertify FLSA Collective Action . Oral Argument Requested. (Attachments: # (1) Declaration of Michael J.D.Sweeney in Support of Plaintiffs Brief in Opposition to Defendants Motion to Decertify FLSA Collective Action, # (2) Exhibit 1 Bussell Dec, # (3) Exhibit 2 Holton Dep, # (4) Exhibit 3 Salmon Dep, # (5) Exhibit 4 Master Sales Contract CONFIDENTIAL, # (6) Exhibit 5 Reed Dep, # (7) Exhibit 6 Kelly Dep, # (8) Exhibit 7 Publix Business Review CONFIDENTIAL, # (9) Exhibit 8 Bussell Dep, # (10) Exhibit 9 Contracts CONFIDENTIAL, # (11) Exhibit 10 KMF Funds CONFIDENTIAL, # (12) Exhibit 11 DSD Benefits CONFIDENTIAL, # (13) Exhibit 12 Pennington Dep, # (14) Exhibit 13 CONFIDENTIAL 2006 TM Study, # (15) Exhibit 14 CONFIDENTIAL 2008 TM Study, # (16) Exhibit 15 2010 RSR Study Holton 27 - CONFIDENTIAL, # (17) Exhibit 16 CONFIDENTIAL Willard Bishop Study, # (18) Exhibit 17 Groulx Dep, # (19) Exhibit 18 Willard Bishop Engagement Letter CONFIDENTIAL, # (20) Exhibit 19 242862 - CONFIDENTIAL - Syracuse Itinerary, # (21) Exhibit 20 Johnson Itinerary, # (22) Exhibit 21 Workload Model Holton Ex 33, # (23) Exhibit 22 CONFIDENTIAL 2008 Labor Budgeting, # (24) Exhibit 23 Job Duty Deposition Testimony Summary, # (25) Exhibit 24 Motus BSN 330959. CONFIDENTIAL, # (26) Exhibit 25 Crowell Written Warning KELLOGG-OPT-IN-EMAIL-075705, # (27) Exhibit 26 Gibson Dep, # (28) Exhibit 27 Hoak Dep, # (29) Exhibit 28 McWell Dep, # (30) Exhibit 29 Sales Account Team Email - Holton Exhibit 17, # (31) Exhibit 30 Young Dep, # (32) Exhibit 31 29378 ltr re new sync requirements for TMs, # (33) Exhibit 32 59983-060065-Handheld user manual 2009, # (34) Exhibit 33 Email Syncing Policy and Discipline KELLOGG-OPT-IN-EMAIL-321833-321834, # (35) Exhibit 34 Account Team Email - Ex. 3 Holton, # (36) Exhibit 35 Emails Directing Orders, # (37) Exhibit 36 Merchandising [questions] Results, # (38) Exhibit 37 Perteete Dep, # (39) Exhibit 38 Nilles Dep, # (40) Exh</p>
8/1/2016	MS	0.9	reivew Ks' opposition to sj
8/1/2016	JF	1.2	Read Defendant's Reply to Plaintiff's Motion to Certify Class
8/1/2016	MS	0.2	address me email re bankruptcy issues
8/1/2016	ME	0.2	<p>send opposing counsel documents filed under seal for plaintiffs' opposition to defendants' summary judgment motion</p>



Date	Staff	Amount of Time	Description
8/1/2016	ME	0.1	email MS to determine availability to speak with opt-in about withdrawing from case
8/1/2016	ME	0.2	send opposing counsel documents filed under seal for Plaintiffs' opposition to Defendants' decertification
			Transfer documents recd from ECF system to docket file and create file copy (Document#415 - RESPONSE, by Plaintiff Patty Thomas, to [394] MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment. Oral Argument Requested. (Attachments: # (1) Declaration, # (2) Exhibit 1, # (3) Exhibit 2, # (4) Exhibit 3, # (5) Exhibit 4, # (6) Exhibit 5-1, # (7) Exhibit 5-1, # (8) Exhibit 6, # (9) Exhibit 7, # (10) Exhibit 8, # (11) Exhibit 9, # (12) Exhibit 10, # (13) Exhibit 11, # (14) Exhibit 12, # (15) Exhibit 13-1, # (16) Exhibit 13-2, # (17) Exhibit 14, # (18) Exhibit 15, # (19) Exhibit 16, # (20) Exhibit 17, # (21) Exhibit 18, # (22) Exhibit 19, # (23) Exhibit 20, # (24) Exhibit 21, # (25) Exhibit 22, # (26) Exhibit 23, # (27) Exhibit 24, # (28) Exhibit 25, # (29) Exhibit 26, # (30) Exhibit 27, # (31) Exhibit 28, # (32) Exhibit 29, # (33) Exhibit 30, # (34) Exhibit 32, # (35) Exhibit 34, # (36) Exhibit 35, # (37) Exhibit 36, # (38) Exhibit 37, # (39) Exhibit 38, # (40) Exhibit 39, # (41) Exhibit 40, # (42) Exhibit 42, # (43) Exhibit 43, # (44) Exhibit 44, # (45) Exhibit 45, # (46) Exhibit 46, # (47) Exhibit 47, # (48) Exhibit 48, # (49) Exhibit 49, # (50) Exhibit 50, # (51) Exhibit 51, # (52) Exhibit 52, # (53) Exhibit 54, # (54) Exhibit 55, # (55) Exhibit 56, # (56) Exhibit 57, # (57) Exhibit 58, # (58) Exhibit 59, # (59) Exhibit 60, # (60) Exhibit 61, # (61) Exhibit 62, # (62) Exhibit 63, # (63) Exhibit 64, # (64) Exhibit 65, # (65) Exhibit 66, # (66)
8/1/2016	CLER	0.3	Declaration)(Sweeney, Michael)
8/1/2016	ME	0.1	email response to opt-in's question about bankruptcy issue
8/1/2016	ME	0.1	forward email to MS about opt-in's questions regarding bankruptcy issue
8/1/2016	ME	0.1	email opt-in to verify time to speak with attorney about withdrawing from case
8/1/2016	ME	0.1	check [questionnaire] for new responses to opt-in rog [questions]
			Transfer documents recd from ECF system to docket file and create file copy (Document#412 - DECLARATION of James M. Nelson in Support of Defendants' Opposition to Plaintiffs' Motion for Partial Summary Judgment filed by Defendants Kellogg Company, Kellogg Sales Company re [397] MOTION for Summary Judgment (Attachments: # (1) Exhibit 1-20, Part 1, # (2) Exhibit 1-20, Part 2, # (3) Exhibit 1-20, Part 3, # (4) Exhibit 1-20, Part 4, # (5) Exhibit 1-20, Part 5, # (6) Exhibit 1-20, Part 6, # (7)
8/1/2016	CLER	0.2	Exhibit 1-20, Part 7, # (8) Exhibit 1-20, Part 8)(Nelson, James)
			Transfer documents recd from ECF system to docket file and create file copy (Document#413 - REQUEST by Defendants Kellogg Company, Kellogg Sales Company for Judicial Notice in Support of Opposition to Plaintiffs' Motion for Partial Summary
8/1/2016	CLER	0.1	Judgment re [412] Declaration, [411] Response to Motion (Nelson, James)
			Transfer documents recd from ECF system to docket file and create file copy (Document#411 - RESPONSE, by Defendants Kellogg Company, Kellogg Sales Company, to
8/1/2016	CLER	0.1	[397] MOTION for Summary Judgment . Oral Argument Requested. (Nelson, James)

Date	Staff	Amount of Time	Description
8/1/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Document#416 - SEALED DOCUMENT by Plaintiff Patty Thomas re [414] MOTION to Seal , [415] Response to Motion,,,,, (Attachments: # (1) Exhibit 3, # (2) Exhibit 5-1, # (3) Exhibit 5-2, # (4) Exhibit 8, # (5) Exhibit 9, # (6) Exhibit 15, # (7) Exhibit 16, # (8) Exhibit 17, # (9) Exhibit 18, # (10) Exhibit 19, # (11) Exhibit 20, # (12) Exhibit 25, # (13) Exhibit 26, # (14) Exhibit 42, # (15) Exhibit 51, # (16) Exhibit 55, # (17) Exhibit 58)(Sweeney, Michael)
8/1/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Document#414 - MOTION to Seal by Plaintiff Patty Thomas. (Attachments: # (1) Declaration, # (2) Proposed Order) Noting Date 8/12/2016, (Dunn, Matt)
8/1/2016	ME	3.5	search for and review information about undrestanding legal citations (for training/development purposes)
8/2/2016	ME	0.2	telephone from opt-in for case update
8/2/2016	AN	0.1	Telephone call from plaintiff for case update
8/2/2016	ME	0.2	telephone call from opt-in for case update
8/2/2016	ME	0.1	listen to voicemail from opt-in about case update
8/2/2016	MR	1.1	examine past charts of classifications by state .3, work up two versions chart of SN opt-ins by state .7, compose email about state charts to team .1
8/2/2016	ME	0.2	telephone call from opt-in for case update
8/2/2016	ME	0.1	send email to opt-in confirming call with attorney about withdrawing from case
8/2/2016	AN	0.1	Compose email to plaintiff to verify correct email address
8/2/2016	JF	2.3	Read Defendant's Reply to SJ Motion 2.3
8/2/2016	JF	0.2	Call from claimant re the case update 0.2
8/2/2016	ME	0.2	telephone call from opt-in for case update
8/2/2016	JF	0.1	MR/JF Review the task to account for Kellogg TM Opt-ins by state 0.1
8/2/2016	MS	0.4	tc w/RI plaintiff re claims and progress
8/2/2016	MS	3.2	review and draft outline for reply to Kellogg brief IO class cert
8/2/2016	JF	0.1	Send email to MR re the task to account for TM Opt-ins by state 0.1
8/3/2016	ME	0.1	MS/ME discuss issue raised by defendant in response to class certification about class representative
8/3/2016	ME	0.3	locate information from defendants' production about plaintiff's employment history to assist attorneys with reply to decertification
8/3/2016	MS	0.1	MS/ME discuss document provided by opt-in regarding bankruptcy issue
8/3/2016	KIM	0.4	MS KW meet RE planning of responding to defendant's 7/29 filings
8/3/2016	ME	0.1	MS/ME discuss document provided by opt-in regarding bankruptcy issue
8/3/2016	MS	0.1	MS/ME discuss issue raised by defendant in response to class certification about class representative
8/3/2016	MS	0.5	review of factual statements in Kellogg's opposition, typicality section
8/3/2016	MS	0.4	MS KW meet RE planning of responding to defendant's 7/29 filings
8/3/2016	KIM	0.1	Finish reading def's opp part sum j
8/3/2016	MS	0.3	review of factual statements in Kellogg's opposition, numerosity section
8/3/2016	KIM	0.6	Resume reading def's opp part sum j
8/3/2016	MS	0.4	review of factual statements in Kellogg's opposition, commonality section
8/3/2016	KIM	0.4	Read opposition to certify
8/3/2016	ME	0.6	verify opt-in's bankruptcy document was submitted as an exhibit in defendants' motion for summary judgment
8/3/2016	MS	0.8	review of factual statements in Kellogg's opposition, adequacy section
8/3/2016	KIM	0.3	Resume reading def's opp part sum j
8/3/2016	ME	0.1	save documents faxed by opt-in regarding bankruptcy issue

Date	Staff	Amount of Time	Description
8/3/2016	CLER	0.1	scan documents faxed by opt-in regarding bankruptcy issue
8/3/2016	KIM	0.9	Print/begin reading def's opp part sum j
8/4/2016	MS	0.2	email to et re amending class defintion on reply
8/4/2016	KIM	2.1	Research for replying to motion to strike
8/4/2016	KIM	1.3	Research for replying to motion to strike
8/4/2016	KIM	1.9	Research for replying to motion to strike
8/4/2016	ME	0.9	read Defendants' Opposition to Plaintiffs' Motion to Certify State Law Class Actions
8/4/2016	ME	0.8	read Defendants' Opposition to Plaintiffs' Motion for Partial Summary Judgment
8/4/2016	KIM	0.7	Summarize defendant arguments on striking industrial studies
8/4/2016	ME	0.2	locate evidence requested by MS for plaintiffs' resply to decertification
8/4/2016	ME	0.1	telephone call from opt-in for case update
8/4/2016	MS	0.3	reviewing rules for responding to Kellogg's motion to strike
			email plaintiffs' work history to MD to assit with plaintiffs' reply to defendants'
8/4/2016	ME	0.1	opposition to class certification
8/4/2016	KIM	0.8	Research for replying to motion to strike
8/5/2016	MR	0.1	send reply to email to MS about stats for Kellogg
8/5/2016	AN	0.2	Telephone call regarding fax received from plaintiff
8/5/2016	MS	3.2	drafting outline for reply iso class cert
8/5/2016	KIM	1.5	Work on response to strike argument
8/8/2016	KIM	0.8	Work on reply to strike argument
8/8/2016	MS	1.1	drafting reply iso sj: Corporate sales section
8/8/2016	KIM	1.3	Work on reply to strike argument
8/8/2016	KIM	2.2	Work on reply to strike argument
8/8/2016	KIM	0.6	Work on reply to strike argument
8/8/2016	MS	0.9	drafting reply iso sj: Plaintiffs don't sell section
8/8/2016	MS	1.1	drafting reply iso sj: primary duty: most important duty section
8/8/2016	KIM	1.5	Work on reply to strike argument
8/8/2016	MS	1.3	drafting reply iso sj: primary duty: time section
8/8/2016	MS	0.7	drafting reply iso sj: primary duty: compenation section section
8/8/2016	MS	1.2	drafting reply iso sj: primary duty: suprevison section section
8/8/2016	MS	1.6	drafting reply iso sj: primary duty: inidicia of sales section
8/8/2016	ME	0.1	telephone call from opt-in for case update
8/9/2016	MA	0.5	proofreading reply in support of summary judgment
8/9/2016	JF	1.3	Read the Defendant's response to Class Certification 1.3
8/9/2016	KIM	1.5	Work on one-way intervention reply section
8/9/2016	KIM	4	Work on one-way intervention reply section
8/9/2016	KIM	3	Work on reply to motion to strike studies
8/9/2016	MS	3.1	drafting rough of argument in reply iso class cert
8/9/2016	MS	4.6	working on draft of reply iso sj for circulation
8/10/2016	MS	1.5	final revisions to circulation draft of reply iso partial sj
8/10/2016	JF	0.1	Compose an email re missing citations in Kellogg Plaintiffs' Reply ISO Partial SJ 0.1
			MR/JF Request MR to prepare Excel spreadsheet to review evidence for hours worked in
8/10/2016	MR	0.2	Kellogg's SN division 0.2
			MS/JF Review the task to assemble evidence for hours worked in Kellogg's Snacks division
8/10/2016	MS	0.1	0.1
			MS/JF Question re the project to assemble evidence for hours worked in Kellogg's Snacks
8/10/2016	JF	0.1	division 0.1

Date	Staff	Amount of Time	Description
8/10/2016	KIM	2.2	Work on reply to motion to strike
			Format the Plaintiffs' Reply ISO Partial SJ brief (per WDWA guidelines) to be reviewed by
8/10/2016	JF	2.6	ET 2.6
8/10/2016	MS	0.2	draft reply iso partial sj to jf for formatting
8/10/2016	KIM	1.6	Work on reply to motion to strike
8/10/2016	JS	1.5	assist with formatting of SJ brief; reply
8/10/2016	MS	3.2	drafting reply iso class cert
8/10/2016	JF	1.9	Work on the hours worked in Kellogg's division of Snacks project 1.9
			search for an exhibit defendants cite in opposition to class certification to determine if it
8/10/2016	ME	0.4	was filed publicly
			MS/JF Review the task to format the Plaintiffs' Reply ISO Partial SJ Brief according to the
8/10/2016	JF	0.1	WDWA Guidelines (ToC, ToA, numbering, etc.) 0.1
			MS/ME discuss verifying if an exhibit defendants cite in opposition to class certification
8/10/2016	MS	0.1	was filed publicly
			MS/ME discuss verifying if an exhibit defendants cite in opposition to class certification
8/10/2016	ME	0.1	was filed publicly
8/10/2016	KIM	1.4	Work on reply to motion to strike
8/10/2016	KIM	1.3	Work on reply to motion to strike
8/10/2016	JF	0.1	ME/JF Advise re formatting in Kellogg Plaintiffs' Reply ISO Partial SJ draft 0.1
8/10/2016	JF	0.3	JS/JF JS to advise JF re formatting of the Kellogg Plaintiffs' Reply ISO Partial SJ draft 0.3
			MS/JF Review the task to assemble evidence for hours worked in Kellogg's Snacks division
8/10/2016	JF	0.1	0.1
8/10/2016	ME	0.1	ME/JF Advise re formatting in Kellogg Plaintiffs' Reply ISO Partial SJ draft 0.1
			MS/JF Review the task to format the Plaintiffs' Reply ISO Partial SJ Brief according to the
8/10/2016	MS	0.1	WDWA Guidelines (ToC, ToA, numbering, etc.) 0.1
8/10/2016	KIM	0.5	Work on reply to motion to strike
8/10/2016	JF	0.3	ME/JF Confer re hours worked in Kellogg Snacks Division project 0.3
			MS/JF Question re the project to assemble evidence for hours worked in Kellogg's Snacks
8/10/2016	MS	0.1	division 0.1
8/10/2016	JS	0.3	JS/JF JS to advise JF re formatting of the Kellogg Plaintiffs' Reply ISO Partial SJ draft 0.3
8/10/2016	ME	0.3	ME/JF Confer re hours worked in Kellogg Snacks Division project 0.3
			MR/JF Request MR to prepare Excel spreadsheet to review evidence for hours worked in
8/10/2016	JF	0.2	Kellogg's SN division 0.2
			MS/JF Delegate the task to review Defendants' Declarations for hours worked in the
8/11/2016	MS	0.1	Snacks division of Kellogg to prepare to file Plaintiffs' Reply ISO Partial SJ brief 0.1
			Execute the task to review Defendants' Declarations for hours worked in the Snacks
8/11/2016	JF	0.4	division of Kellogg to prepare to file Plaintiffs' Reply ISO Partial SJ brief 0.4
8/11/2016	MS	1.3	review and revise opp to motion to strike
8/11/2016	MS	0.2	review and incorp proof reading comments
8/11/2016	MS	0.2	circulate draft reply iso class cert
8/11/2016	JF	0.3	Re-format the Plaintiffs' Reply ISO Partial SJ brief 0.3
8/11/2016	MS	0.1	MS/JF Update re hours worked in the Kellogg's division of Snacks project 0.1
8/11/2016	JF	0.1	MS/JF Update re hours worked in the Kellogg's division of Snacks project 0.1
			MS/JF Delegate the task to review Defendants' Declarations for hours worked in the
8/11/2016	JF	0.1	Snacks division of Kellogg to prepare to file Plaintiffs' Reply ISO Partial SJ brief 0.1

Date	Staff	Amount of Time	Description
8/11/2016	MS	5.6	drafting reply ISO class cert
8/11/2016	JS	1.2	reformat brief and edit; re-mark and regenerate Table of Authorities
8/11/2016	ME	0.1	JF/ME discuss status of project of gathering information to assist attorneys with reply to defendants' opposition to class certification
8/11/2016	JF	0.1	JF/ME discuss status of project of gathering information to assist attorneys with reply to defendants' opposition to class certification
8/11/2016	KIM	2	Structural edits to opp motion strike studies section
8/11/2016	KIM	2	Structural edits to opp motion strike studies section
8/11/2016	MA	0.5	proofreading reply iso class cert
8/11/2016	KIM	1.5	Additional research for opp strike studies
8/11/2016	KIM	0.5	Follow-up research for mot strike
8/15/2016	KIM	0.3	Organize Kellogg files from 2015
8/15/2016	KIM	0.4	Organize Kellogg files from 2015
8/15/2016	MS	0.8	ms/et discuss et comments on reply iso class cert
8/15/2016	ME	0.1	MS/ME discuss providing case update to named plaintiff
8/15/2016	MS	0.9	incorporating et comments on reply iso class cert--numerosity section, including legal research
8/15/2016	ME	0.1	reply to plaintiff's email requesting case update
8/15/2016	MS	0.4	reivew et comments on reply iso class cert
8/15/2016	MS	0.1	MS/ME discuss providing case update to named plaintiff
8/15/2016	KIM	0.5	Review ET comments on draft reply msj
8/15/2016	ME	0.1	respond to opt-in's email with request for case update
8/15/2016	JS	0.8	proof and format reply brief
8/15/2016	MS	1.1	incorporating et comments on reply iso class cert--predominance section re common evidence of job duties, including legal research
8/15/2016	MS	1.3	incorporating et comments on reply iso class cert--commonality section, including legal research
8/15/2016	MS	1.4	incorporating et comments on reply iso class cert--predominance section re hours, including legal research
8/15/2016	KIM	0.4	Review borrowed string cites in strike section of reply
8/15/2016	MS	0.5	incorporating et comments on reply iso sj and circulate for formatting
8/15/2016	MS	1.6	revising kw draft of response to motion to strike for inclusion in reply iso class cert--predominance section re common evidence of job duties, including legal and record research
8/15/2016	KIM	0.3	Review borrowed string cites in strike section of reply
8/16/2016	JF	4.2	JS/JF Format (ToA/ToC) the Plaintiff's reply ISO SJ brief 4.2
8/16/2016	MS	0.3	md/ms discussing reply briefs for summary judgment/class certification 0.3
8/16/2016	MD	2	editing class certification motion 2.0
8/16/2016	JS	3.5	work on formatting reply brief, ToC / ToA, proofing, researching full cites
8/16/2016	MD	0.3	md/ms discussing reply briefs for summary judgment/class certification 0.3
8/17/2016	JF	6.1	Format ToA/ToC to file the Reply ISO class certification 6.1
8/17/2016	JS	0.4	call for update
8/17/2016	CLER	0.1	create PDF format of CTS recd
8/17/2016	CLER	0.1	Data Entry of Contact Information
8/18/2016	MA	0.1	assist JF in formatting brief
8/18/2016	MD	3	editing class and summary judgment briefing for filing 3.0
8/18/2016	KIM	0.3	Review contracts research for MD work on MSJ reply
8/18/2016	JF	0.2	Call from claimant re case update .2
8/18/2016	JF	5.6	Supply citations for Reply ISO Class Certification brief 5.6
8/19/2016	AN	0.2	AN/ME discuss speaking with intake about new case

Date	Staff	Amount of Time	Description
8/19/2016	ME	0.1	leave voicemail for intake regarding late CTS
8/19/2016	ME	0.3	reply to opt-in's email about bankruptcy issue
8/19/2016	AG	0.1	ECF Filing of REPLY TO RESPONSE to [400] MOTION to Certify Class
			Transfer documents recd from ECF system to docket file and create file copy (Document#419 - REPLY, filed by Plaintiff Patty Thomas, TO RESPONSE to [400] MOTION
8/19/2016	CLER	0.1	to Certify Class (Sweeney, Michael)
8/19/2016	ME	0.1	MD/ME discuss client's email regarding bankruptcy issue
			CM/JF Question about formatting a brief to prepare for Kellogg Reply ISO Class
8/19/2016	JF	0.1	Certification filing 0.1
8/19/2016	MA	0.5	proofreading reply ISO summary judgment
			CM/JF Question about formatting a brief to prepare for Kellogg Reply ISO Class
8/19/2016	CM	0.1	Certification filing 0.1
8/19/2016	JF	0.2	MD/JF File (via ECF) the Plaintiffs' Reply ISO Motion for Partial SJ 0.2
			ME/JF Question about formatting a brief to prepare for Kellogg Reply ISO Class
8/19/2016	JF	0.1	Certification filing 0.1
			ME/JF Question about formatting a brief to prepare for Kellogg Reply ISO Class
8/19/2016	ME	0.1	Certification filing 0.1
8/19/2016	MD	4	editing and finalizing class certification and summary judgment briefs for filing 4.0
8/19/2016	ME	0.2	AN/ME discuss speaking with intake about new case
			Transfer documents recd from ECF system to docket file and create file copy (Document#418 - ORDER granting [414] Motion to Seal; documents are sealed and will
8/19/2016	CLER	0.1	remain sealed; signed by Judge Ronald B. Leighton.(DN)
			Transfer documents recd from ECF system to docket file and create file copy (Document#417 - ORDER granting [406] Motion to Seal; the documents are sealed and will
8/19/2016	CLER	0.1	remain sealed; signed by Judge Ronald B. Leighton.(DN)
8/19/2016	MD	0.2	MD/JF File (via ECF) the Plaintiffs' Reply ISO Motion for Partial SJ 0.2
8/19/2016	JF	0.8	Finalize formatting changes to Kellogg Reply ISO Class Certification brief 0.8
8/19/2016	MA	0.6	proofreading reply ISO class certification
			AG/MD/JF Check on the latest filings in the case (SJ Reply and Reply to Response to
8/22/2016	AG	0.2	Motion to Certify Class) 0.2
			AG/MD/JF Check on the latest filings in the case (SJ Reply and Reply to Response to
8/22/2016	MD	0.2	Motion to Certify Class) 0.2
			Transfer documents recd from ECF system to docket file and create file copy (Document#421 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company,
8/22/2016	CLER	0.1	TO RESPONSE to [392] MOTION To Decertify FLSA Collective Action (Nelson, James)
			Transfer documents recd from ECF system to docket file and create file copy (Document#422 - DECLARATION of James M. Nelson filed by Defendants Kellogg
8/22/2016	CLER	0.1	Company, Kellogg Sales Company re [392] MOTION To Decertify FLSA Collective Action (Nelson, James)
			Transfer documents recd from ECF system to docket file and create file copy (Document#423 - REPLY, filed by Defendants Kellogg Company, Kellogg Sales Company,
8/22/2016	CLER	0.1	TO RESPONSE to [394] MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment (Nelson, James)
			Transfer documents recd from ECF system to docket file and create file copy (Document#420 - REPLY, filed by Plaintiff Patty Thomas, TO RESPONSE to [397] MOTION
8/22/2016	CLER	0.1	for Summary Judgment (Sweeney, Michael)
			Review Defendants' filings in the case (Reply ISO D's SJ Motion and Reply ISO D's Motion
8/22/2016	JF	2.1	to Decertify FLSA) 2.1



Date	Staff	Amount of Time	Description
8/22/2016	JF	0.2	AG/MD/JF Check on the latest filings in the case (SJ Reply and Reply to Response to Motion to Certify Class) 0.2
8/23/2016	JF	0.1	Email a claimant a case update 0.1
8/24/2016	ME	0.1	telephone call from opt-in for case update
8/24/2016	MD	0.1	MD/ME discuss follow up conversation with intake regarding filing new case
8/24/2016	ME	0.4	telephone call from opt-in for update .2; edit notes from conversation .1; email information about conversation to MD .1
8/24/2016	ME	0.1	MD/ME discuss follow up conversation with intake regarding filing new case
8/24/2016	ME	0.7	complete interview with intake .4; edit notes from intake .2; email intake form to MD .1
8/25/2016	MD	0.3	update to client about case status and current job demands 0.3
8/25/2016	ME	0.2	telephone call from opt-in for case update
8/29/2016	MD	0.5	read Kellogg reply briefs
8/29/2016	ME	0.1	telephone call from opt-in for case update
8/29/2016	ME	0.1	left voicemail for intake
8/29/2016	ME	0.4	summarize information about opt-in discovery to send to MD
8/29/2016	ME	0.3	download opt-in's [questions] for rog .1 create answer to interrogatory based on [questions] responses .2
8/30/2016	ME	0.1	MD/ME discuss plan for producing remaining opt-in discovery
8/30/2016	ME	0.2	email opt-in regarding reviewing answer to interrogatories and sending documents to our office
8/30/2016	MD	0.1	MD/ME discuss plan for producing remaining opt-in discovery
8/30/2016	ME	0.2	finalize plan for producing remaining opt-in discovery
8/30/2016	ME	0.1	email opt-in regarding sending documents to our office
8/30/2016	ME	0.2	email opt-in regarding reviewing answer to interrogatories and sending documents to our office
8/31/2016	ME	0.1	telephone call from opt-in about rog
8/31/2016	ME	0.1	listen to voicemail from intake
8/31/2016	ME	0.1	returned telephone call to intake about joining case
9/1/2016	ME	0.2	telephone call from opt-in for case update
9/1/2016	ME	1.3	prepare opt-in's documents for production to defense counsel
9/1/2016	ME	0.1	reply to opt-in's email requesting case update
9/1/2016	ME	0.1	email link to case update to opt-in
9/6/2016	JF	0.2	Give an update to a claimant over the phone 0.2
9/7/2016	CLER	0.3	file documents produced to opposing counsel last week .2; track production of documents in spreadsheet .1
9/7/2016	ME	0.1	telephone call from opt-in for case update
9/7/2016	ME	1	draft case update for website for attorneys to review
9/8/2016	ME	0.1	reply to opt-in's email regarding updated contact information
9/8/2016	ME	0.1	reply to opt-in's email regarding discovery documents
9/9/2016	ME	0.1	telephone call from opt-in for case update
9/9/2016	ME	0.3	prepare opt-in's documents for production to opposing counsel
9/9/2016	ME	0.1	MD/ME discuss opt-in's termination concerns
9/9/2016	ME	0.1	reply to opt-in's email about change of address
9/9/2016	ME	0.1	email MD with question about opt-in's discovery documents
9/9/2016	ME	0.4	telephone call from opt-in about termination .3; notes from conversation .1
9/9/2016	MD	0.2	responding to ME re opt-in discovery production and termination 0.2
9/9/2016	ME	0.1	reply to opt-in's email about change of address
9/12/2016	ME	0.1	telephone call to opt-in; left message
9/12/2016	JF	0.1	Compose an email to a claimant with the latest case update 0.1

Date	Staff	Amount of Time	Description
9/12/2016	ME	0.1	listen to voicemail from opt-in
9/12/2016	ME	0.2	telephone call from opt-in for case update
9/12/2016	ME	0.2	telephone call from opt-in for case update
9/12/2016	JF	0.2	Call from a claimant re the case update 0.2
9/13/2016	ME	0.5	attempt to locate template letter for returning consents to sue .3; draft return of consent to sue letter for intake who sent consent to sue after period to join the case has ended
9/13/2016	ME	0.1	update case update spreadsheet for other paralegals to reference
9/13/2016	ME	0.1	email case update to team for review before posting to website
9/13/2016	ME	0.1	reply to opt-in's email with case update
9/14/2016	ME	0.1	reply to opt-in's email regarding updated contact information and case update
9/14/2016	ME	0.1	update client's contact information in client database
9/14/2016	ME	0.4	prepare letter with returned CTS to send to intake .3; redo preparation for updated letter .1
9/14/2016	ME	0.1	reply to opt-in's email regarding updated contact information and case update
9/14/2016	ME	0.3	post case update to website
9/14/2016	ME	0.1	update client's contact information in client database
9/14/2016	ME	0.1	email CM about contacting clients regarding case update
9/15/2016	ME	0.1	reply to opt-in's email requesting case update
9/15/2016	ME	0.1	reply to opt-in's email requesting case update
9/16/2016	MD	0.1	MD/ME discuss responding to intakes interested in joining case
9/16/2016	ME	0.1	MD/ME discuss responding to intakes interested in joining case
9/16/2016	ME	0.2	draft reply email to intake requesting an update
9/19/2016	ME	0.1	email intake regarding never receiving consent to sue
9/21/2016	JF	0.1	Call from claimant re the case update 0.1
9/23/2016	CLER	0.2	file hard copies of case related documents
9/23/2016	ME	0.3	IA telephone call from opt-in for case update
9/23/2016	ME	0.1	email opt-in link to case updates
9/23/2016	ME	0.2	rescan opt-in's documents that were accidentally deleted from file server
9/29/2016	ME	0.1	reply to opt-in's email requesting case update
9/29/2016	ME	0.1	ME/JF Discuss how to address claimant's question re Kellogg mandatory car purchase 0.1
9/29/2016	ME	0.1	reply to opt-in's email requesting case update
9/29/2016	ME	0.1	send email to MS about client's legal question
9/29/2016	ME	0.1	email MD about client's question regarding claims
9/29/2016	JF	0.2	Call from claimant re the case update 0.2
9/29/2016	ME	0.1	reply to opt-in's email requesting case update
9/29/2016	ME	0.1	reply to opt-in's email requesting case update
9/29/2016	ME	0.1	reply to opt-in's email requesting case update
9/29/2016	ME	0.1	reply to opt-in's email requesting case update
9/29/2016	JF	0.1	ME/JF Discuss how to address claimant's question re Kellogg mandatory car purchase 0.1
9/30/2016	MS	0.1	MS/ME discuss responding to client about status in case
9/30/2016	ME	0.1	respond to opt-in's email requesting case update
9/30/2016	ME	0.2	draft email to opt-in in reply to opt-in's question about claim status
9/30/2016	ME	0.2	telephone call from opt-in for case update
9/30/2016	ME	0.1	MS/ME discuss responding to client about status in case
9/30/2016	ME	0.1	left voicemail for opt-in who had questions about claims
10/3/2016	ME	0.1	respond to opt-in's email requesting case update
10/3/2016	ME	0.1	reply to opt-in's email asking of status of claims in case

Date	Staff	Amount of Time	Description
10/12/2016	ME	0.1	reply to opt-in's email regarding updated contact information
10/12/2016	ME	0.1	returned opt-in's call for case update
10/12/2016	ME	0.1	reply to opt-in's email regarding updated contact info
10/19/2016	JF	0.1	Call from a claimant re the case update
10/24/2016	JF	0.2	Call from claimant re the case update
10/31/2016	JF	0.2	Call from a claimant for a case update
11/2/2016	ME	0.1	reply to opt-in's email requesting case update
11/9/2016	ME	0.1	reply to email from opt-in requesting case update
11/10/2016	MS	0.4	review scheduling order for oral argument and schedule transporation
11/10/2016	MS	0.1	email to local counsel re oral argument date and availability
11/10/2016	MS	0.1	email to md re oral argument date and availability
Transfer documents recd from ECF system to docket file and create file copy (Document#424 - NOTICE of Hearing on Motions: [397] MOTION for Summary Judgment , [392] MOTION To Decertify FLSA Collective Action , [400] MOTION to Certify Class , [394] [392] MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment)			
11/10/2016	CLER	0.1	MOTION for Summary Judgment or, in the Alternative, Partial Summary Judgment)
MS/ME review preparation needed for oral argument on summary judgment,			
11/15/2016	ME	0.2	decertification, and class cert
MS/ME review preparation needed for oral argument on summary judgment,			
11/15/2016	MS	0.2	decertification, and class cert
11/15/2016	ME	0.1	Respond to opt-in's email requesting a case update
11/15/2016	ME	0.1	Respond to opt-in's email requesting a case update
11/15/2016	ME	0.1	Respond to opt-in's email requesting a case update
11/15/2016	ME	0.1	Respond to opt-in's email requesting a case update
11/15/2016	ME	0.4	draft case update for website
11/15/2016	JF	0.1	Review the edits of the most recent case update
11/15/2016	ME	0.2	ME/JF ME to tutor JF on how to post a case update on the website
11/15/2016	JF	0.2	ME/JF ME to tutor JF on how to post a case update on the website
11/15/2016	ME	0.1	read notice of oral argument for summary judgment
11/16/2016	MR	1	laptop prep for oral arguments .5, additional documents prep for oral arguments .5
11/16/2016	MS	0.2	forward breifing to et for call re oral argument
review courtroom technology on court's website .1; email information to litigation team			
11/16/2016	ME	0.2	.1
11/16/2016	ME	0.1	email MD regarding opt-in's retaliation concerns
11/16/2016	ME	0.1	reply to opt-in's email requesting a case update
11/16/2016	MS	0.4	review emails re possible retaliation and draft responses
11/16/2016	JF	1.2	MR/JF Perform research for relevant deposition citations to be used in the oral argument
MR/ME review discovery documents needed to conduct data analysis about hours			
11/16/2016	ME	0.3	worked to assist attorneys with oral argument
11/16/2016	MR	1.2	MR/JF Perform research for relevant deposition citations to be used in the oral argument
11/16/2016	MS	1.1	review briefing and exhibits for oral argument
MS/MR/ME/JF Review the task to compile research re Variable Labor calculations to be			
11/16/2016	JF	0.2	used during oral argument
MR/ME review discovery documents needed to conduct data analysis about hours			
11/16/2016	MR	0.3	worked to assist attorneys with oral argument
11/16/2016	JF	0.2	ME/JF Check-in re 30B6 Deposition location in the case folder
11/16/2016	MS	0.9	ms/et discuss oral argument for sj and cert

Date	Staff	Amount of Time	Description
11/16/2016	ME	0.5	compile summary judgment and class certification exhibits to use during oral argument
11/16/2016	MR	0.4	MS/MR Review document needs for oral arguments
11/16/2016	ME	0.1	reply to opt-in's email requesting a case update
11/16/2016	MS	0.5	review of available technology in Tacoma Courthouse for oral argument
11/16/2016	ME	0.2	MS/MR/ME/JF Review the task to compile research re Variable Labor calculations to be used during oral argument
11/16/2016	ME	0.1	reply to opt-in's email requesting a case update
11/16/2016	MS	0.2	MS/MR/ME/JF Review the task to compile research re Variable Labor calculations to be used during oral argument
11/16/2016	ME	0.4	draft reply email to email requesting clarification for case update
11/16/2016	MR	0.2	MS/MR/ME/JF Review the task to compile research re Variable Labor calculations to be used during oral argument
11/17/2016	MR	0.2	JK/MR discuss oral argument laptop and video concerns
11/17/2016	MR	0.2	MR/ME discuss discovery document needed for analysis to assist attorneys with oral argument .1; discuss courtroom technology
11/17/2016	MS	0.1	MS/ME discuss responding to client's questions about status in case
11/17/2016	ME	0.1	print documents for oral argument for dispositive motions
11/17/2016	ME	0.1	MS/ME discuss responding to client's questions about status in case
11/17/2016	MS	0.2	MS/ME discuss exhibits to be printed for oral argument .1; and courtroom technology .1
11/17/2016	ME	0.2	MR/ME discuss discovery document needed for analysis to assist attorneys with oral argument .1; discuss courtroom technology
11/17/2016	ME	0.2	ME/JF Check-in re 30B6 Deposition location in the case folder
11/17/2016	JK	0.4	jk Prepare laptop for travel.
11/17/2016	MS	0.9	MS/ME provide feedback on presentation of oral argument
11/17/2016	ME	0.3	travel to and from print shop to have color docs printed for oral argument re summary judgment and class cert/decert
11/17/2016	MS	1.1	review sj briefing in preparation for oral argument
11/17/2016	ME	0.9	MS/ME provide feedback on presentation of oral argument
11/17/2016	MR	1	2nd laptop prep for oral arguments (problems with 1st laptop)
11/17/2016	MR	4.4	Continued research of discovery for items related to hours worked for Oral Arguments
11/17/2016	MS	0.7	review variable labor methodologies and prepare for exhibit for oral argument (.7)
11/17/2016	MR	0.4	review information about Tacoma court technology .2, order video cable adapter for oral arguments .2
11/17/2016	ME	0.2	MS/ME discuss exhibits to be printed for oral argument .1; and courtroom technology .1
11/17/2016	JF	0.1	ME/JF Check-in re task to locate RSR Budgeting Tool Excel spreadsheet
11/17/2016	ME	0.1	ME/JF Check-in re task to locate RSR Budgeting Tool Excel spreadsheet
11/17/2016	JF	0.1	Call claimant in the case to give an update
11/17/2016	JK	0.2	JK/MR discuss oral argument laptop and video concerns
11/17/2016	MR	0.3	MS/MR follow-up discussion on variable labor and related information for oral arguments and damages
11/17/2016	MR	2.6	examine various excel Def production relating to tracking variable labor 1.5, search for emails relating to model summaries and related .3, catalog variable labor reports produced .3, read through excerpts of depositions regarding TM hours budgeting .4,
11/17/2016	MR	0.4	check emails for budget buster reports .1
11/17/2016	MS	0.4	MS/MR Review document needs for oral arguments

Date	Staff	Amount of Time	Description
11/17/2016	ME	0.1	edit draft response to client's class certification question for attorney to review
			MS/MR follow-up discussion on variable labor and related information for oral arguments
11/17/2016	MS	0.3	and damages
11/17/2016	ME	0.1	edit draft response to client's class certification question for attorney to review
11/18/2016	ME	0.2	locate summary judgment exhibit to use for oral argument
11/18/2016	ME	0.2	MR/ME discuss discovery documents needed for damage calculations
			contact Courtroom Deputy regarding courtroom technical for summary judgment oral
11/18/2016	ME	0.2	argument
			continued work on reviewing case production documents 1.5, examine Budget Buster spreadsheets .5, examine training docs with formulas for RSR and VL hours .5, examine
11/18/2016	MR	3.2	deficiencies in KSTARS data .3, send multiple emails to team about these documents .4
			continued search of Kellogg discovery documents regarding model summaries and
11/18/2016	MR	2.2	itineraries
11/18/2016	MS	1.3	preparing outline for oral argument
11/18/2016	MS	1.4	collecting and annotating exhibits for oral argument
11/18/2016	MS	0.8	ms/md discuss oral argument strategy and approach
11/18/2016	MR	0.1	review email from MS about spreadsheet with examples of how VL was diminished
11/18/2016	MD	0.8	ms/md discuss oral argument strategy and approach
11/18/2016	MS	1	ms/et discuss oral argument strategy and fact
11/20/2016	MS	8	travel to Tacoma for SJ argument
11/20/2016	MS	3.6	review motions and exhibits in preparation for oral argument
11/20/2016	MR	0.5	briefly review Johnson itinerary sheet .3, review other notes on itinerary sheets .2
11/21/2016	ME	0.2	ME/JF Discuss the questions sent from MS to be used in the Oral Argument
11/21/2016	MR	0.2	MR/ME discuss discovery documents needed for damage calculations
11/21/2016	JF	0.2	ME/JF Discuss the questions sent from MS to be used in the Oral Argument
			MR/ME review information about current opt-ins to provide to MS as requested for oral
11/21/2016	ME	0.2	argument
11/21/2016	ME	1.9	compile discovery data requested by MS for summary judgment oral argument
11/21/2016	ME	0.1	email opt-in link to case updates
11/21/2016	MS	0.4	circulate memo on oral argument to litigation team
11/21/2016	ME	0.2	MR/ME discuss discovery documents needed for damage calculations
11/21/2016	MS	0.4	debriefing w/ local counsel re oral argument and next steps
11/21/2016	MR	0.1	MR/ME review where to find data about opt-in job categories
			MR/ME review information about current opt-ins to provide to MS as requested for oral
11/21/2016	MR	0.2	argument
11/21/2016	JF	0.6	Tally the number of DEF and PLT depositions to be used in the Oral Argument
11/21/2016	ME	0.1	MR/ME review where to find data about opt-in job categories
11/21/2016	MS	2.1	attend sj oral argument
11/21/2016	MS	1.9	rehearsing oral argument and use of exhibits
11/21/2016	ME	0.1	telephone call from opt-in for case update
11/21/2016	MS	4.6	devleopiing and outlining sj argument and incorporating exhibits
11/21/2016	MS	0.3	conversation w/ Kellogg counsel about next steps
11/21/2016	MS	0.7	meeting w/ local counsel re argument
			review prior damage calcs .5, review match up docs .5, ascertain number of clients with
11/21/2016	MR	1.9	both MF and SN claims .5, review counts for MF and SN optins .4
11/22/2016	ME	0.1	telephone call from opt-in for case update
11/22/2016	MS	9	travel Tacoma to NP, NY back from sj argument

Date	Staff	Amount of Time	Description
11/23/2016	JF	0.2	MS/JF MS to update JF about the outcome of the oral argument
11/23/2016	MS	0.2	MS/JF MS to update JF about the outcome of the oral argument
11/28/2016	MD	0.5	ms/md discuss proving damages strategy and available evidence
11/28/2016	MS	0.5	ms/md discuss proving damages strategy and available evidence
			review [client], [client] and other itinerary and related documents for upcoming team
11/28/2016	MR	1.2	mtg
11/28/2016	MS	0.1	ms/me discuss setting litigation team meeting
11/28/2016	ME	0.1	ms/me discuss setting litigation team meeting
11/28/2016	MS	0.2	draft and circulate agenda for litigation team meeting
11/28/2016	MS	1.6	legal research on using [ ] for damages calculations
11/28/2016	MS	0.6	ms/md discuss damages strategy and steps moving forward after sj/cert argument
11/28/2016	ME	0.1	schedule litigation team meeting
11/28/2016	MD	0.6	ms/md discuss damages strategy and steps moving forward after sj/cert argument
11/28/2016	MS	2.2	legal research into expert damage testimony
11/29/2016	MS	2.5	drafting plan for expert damage testimony
11/30/2016	MS	0.3	solicit expert references
			MS/MD/MR/ME/JF Case Meeting to 1. review the results of the oral argument hearing .1;
			2. review the information needed for trial (liability and damage plans) .8; 3. review the
11/30/2016	ME	1	upcoming communications to/with class .1
			MS/MD/MR/ME/JF Case Meeting to 1. review the results of the oral argument hearing .1;
			2. review the information needed for trial (liability and damage plans) .8; 3. review the
11/30/2016	MD	1	upcoming communications to/with class .1
			MS/MD/MR/ME/JF Case Meeting to 1. review the results of the oral argument hearing .1;
			2. review the information needed for trial (liability and damage plans) .8; 3. review the
11/30/2016	MS	1	upcoming communications to/with class .1
			MS/MD/MR/ME/JF Case Meeting to 1. review the results of the oral argument hearing .1;
			2. review the information needed for trial (liability and damage plans) .8; 3. review the
11/30/2016	MR	1	upcoming communications to/with class .1
11/30/2016	ME	0.1	forward email to MS about retaliation concerns
			MS/MD/MR/ME/JF Case Meeting to 1. review the results of the oral argument hearing .1;
			2. review the information needed for trial (liability and damage plans) .8; 3. review the
11/30/2016	JF	1	upcoming communications to/with class .1
			ME/JF Review of the tasks needed to perform an inventory of documents in preparation
12/1/2016	ME	0.1	for the trial
			ME/JF Review of the tasks needed to perform an inventory of documents in preparation
12/1/2016	JF	0.1	for the trial
12/1/2016	MS	0.6	research on potential expert [witness] and email
			draft email to team about inventory of discovery data that can be used for damages for
12/1/2016	ME	0.5	trial
12/1/2016	MS	0.8	review various sets of class member data for damages
12/1/2016	ME	0.5	JF/ME inventory discovery data that can be used to analyze damages for trial
12/1/2016	ME	0.1	telephone call from opt-in for case update
12/1/2016	JF	0.5	JF/ME inventory discovery data that can be used to analyze damages for trial
12/1/2016	ME	0.5	MS/ME review discovery information about territories to support damages trial plan
12/1/2016	MS	0.5	MS/ME review discovery information about territories to support damages trial plan
12/1/2016	ME	0.1	JF/ME discuss overview of meeting to gather data for trial preparation



Date	Staff	Amount of Time	Description
12/1/2016	MS	0.8	research on potential expert [witness] and email
12/1/2016	JF	0.1	JF/ME discuss overview of meeting to gather data for trial preparation
12/2/2016	ME	0.1	email link to case updates to opt-in
12/2/2016	ME	0.1	telephone call from opt-in for case update
12/2/2016	MS	0.1	MS/MR discuss paras' email listing data produced .1, discuss work going forward .1
12/2/2016	MS	0.2	MS/ME discuss responding to opt-in's retaliation concerns
12/2/2016	MS	0.5	tc w/ opt-in re retaliation concerns
12/2/2016	MR	0.1	MS/MR discuss paras' email listing data produced .1, discuss work going forward .1
12/2/2016	ME	0.2	MS/ME discuss responding to opt-in's retaliation concerns
12/2/2016	MS	0.9	tc w/ ET re damages strategies
12/2/2016	MS	0.1	md/ms discussing paradigm to deal with retaliation allegations
12/2/2016	MD	0.1	md/ms discussing paradigm to deal with retaliation allegations
12/2/2016	JF	3.2	Determine what itineraries we have in our inventory to prepare for the trial read through email from paras on inventory list of data produced .1, add comments on
12/4/2016	MR	1.6	some items on list .2, add many additional items to list 1.3
12/5/2016	MR	0.6	review and edit spreadsheet of opt-ins counts in SN and MF
12/5/2016	MS	0.4	ms/md discuss sj/class cert decision
12/5/2016	MD	0.4	ms/md discuss sj/class cert decision
12/5/2016	MS	0.3	review sj/class cert decision, legal research on 23(f) appeal
12/5/2016	MS	0.2	email to ET re 23(f) appeal
12/5/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#426 ORDER denying [394] Motion for Summary Judgment; denying [397] Motion for Summary Judgment; denying [400] Motion to Certify Class)
12/5/2016	JF	0.2	Call with opt-in re case update
12/5/2016	MS	0.8	interview w/ potential damage expert
12/5/2016	JF	0.6	Check what itineraries we have in our possession
12/5/2016	MR	0.2	additional work on opt-in list .1, send email to para ME about opt-in counts .1 pull new Time Matters list of clients.3, perform match-up 1.0, obtain definitive list of
12/5/2016	MR	1.4	current opt-ins .1
12/6/2016	ME	0.1	ME/JF Brief check-in re the division of tasks/responsibilities
12/6/2016	JF	0.1	ME/JF JF to check with ME re list of opt-ins with bankruptcy proceedings MS/ME/JF Meet to discuss 1. court order on motion for Summary Judgment .2; 2. set-up
12/6/2016	MS	0.7	of internal deadlines .2; 3. Inventory of data process .3
12/6/2016	JF	0.1	ME/JF Brief check-in re the division of tasks/responsibilities MS/ME/JF Meet to discuss 1. court order on motion for Summary Judgment .2; 2. set-up
12/6/2016	ME	0.7	of internal deadlines .2; 3. Inventory of data process .3
12/6/2016	JF	0.4	Draft an update to be sent to opt-ins/put on website re ruling on dispositive Motions
12/6/2016	JF	0.1	Draft an email to MR re meeting on data inventory
12/6/2016	ME	0.2	read Order on dispositive motions
12/6/2016	MS	0.6	call w/ et re appeal of R23 order
12/6/2016	MS	1.1	t conf w/ potential expert
12/6/2016	JF	0.7	Draft an update to be sent to opt-ins/put on website re ruling on dispositive Motions MS/ME/JF Meet to discuss 1. court order on motion for Summary Judgment .2; 2. set-up
12/6/2016	JF	0.7	of internal deadlines .2; 3. Inventory of data process .3
12/6/2016	ME	0.1	send email to MS about client's question
12/6/2016	AD	0.4	review Kellogg smj order .4

Date	Staff	Amount of Time	Description
12/6/2016	MD	0.2	strategizing re appeal of class cert denial
12/6/2016	MS	0.2	strategizing re appeal of class cert denial
12/7/2016	JF	0.2	ME/JF Check-in re plan to assemble inventory information
12/7/2016	MR	1.3	MD/MS/MR(in part)/JF/ME review Court's decision on dispositive motions .1; discuss damages trial plan 1.4; discuss communicating case update to class .1
12/7/2016	MR	0.8	examine new motus data (received in June from motus) .6, examine number of add'l opt-ins included .1, saved data to server .1
12/7/2016	ME	1.6	MD/MS/MR(in part)/JF/ME review Court's decision on dispositive motions .1; discuss damages trial plan 1.4; discuss communicating case update to class .1
12/7/2016	MS	0.7	tc w/ potential expert
12/7/2016	MD	1.6	MD/MS/MR(in part)/JF/ME review Court's decision on dispositive motions .1; discuss damages trial plan 1.4; discuss communicating case update to class .1
12/7/2016	MS	1.6	MD/MS/MR(in part)/JF/ME review Court's decision on dispositive motions .1; discuss damages trial plan 1.4; discuss communicating case update to class .1
12/7/2016	JF	1.6	MD/MS/MR(in part)/JF/ME review Court's decision on dispositive motions .1; discuss damages trial plan 1.4; discuss communicating case update to class .1
12/7/2016	MS	0.2	drafting agenda for team mtg
12/7/2016	JF	0.1	ME/JF Check in re potential tasks in preparation for the trial
12/7/2016	ME	0.1	ME/JF Check in re potential tasks in preparation for the trial
12/7/2016	JF	0.1	MR/JF Check-in re MR's availability to discuss the data inventory project in order to prepare for the trial proceedings
12/7/2016	ME	0.3	MR/ME discuss meeting agenda for trial plan
12/7/2016	MR	0.1	MR/JF Check-in re MR's availability to discuss the data inventory project in order to prepare for the trial proceedings
12/7/2016	ME	0.1	leave voicemail for opt-in
12/7/2016	MR	0.3	MR/ME discuss meeting agenda for trial plan
12/8/2016	ME	0.1	ME/JF Check-in re schedule of data inventory meeting
12/8/2016	MS	0.1	MS/JF Brief review of the process to compose a successful website update
12/8/2016	JF	0.1	MS/JF Brief review of the process to compose a successful website update
12/8/2016	ME	0.2	ME/JF Check-in re plan to assemble inventory information
12/8/2016	JF	0.1	ME/JF Check-in re schedule of data inventory meeting
12/9/2016	JF	0.1	Review the case update (for paralegals)
12/9/2016	ME	0.2	ME/JF Check-in with ME re case update email
12/9/2016	JF	0.1	JS/JF Review the task to distill the website/email update in anticipation of the opt-in response
12/9/2016	JS	0.1	JS/JF Review the task to distill the website/email update in anticipation of the opt-in response
12/9/2016	JS	0.2	Draft Kellogg Case Spreadsheet update
12/9/2016	JF	0.2	ME/JF Check-in with ME re case update email
12/9/2016	JF	0.2	JF/ME review sending case update to opt-ins
12/9/2016	JS	0.4	JS/JF Post case update on the website
12/9/2016	JF	0.4	JS/JF Post case update on the website
12/9/2016	JF	0.2	Call from opt-in re case update
12/9/2016	JF	0.6	JS/JF JS to advise JF re assembly of opt-in list in order to send an email update draft email to opt-ins that Kellogg has moved to dismiss because they did not disclose
12/9/2016	ME	0.3	claims in this case
12/9/2016	ME	0.2	telephone call from opt-in for case update
12/9/2016	ME	0.1	MS/ME discuss email to be sent to opt-ins with case update
12/9/2016	MS	0.1	MS/ME discuss email to be sent to opt-ins with case update
12/9/2016	JS	0.6	JS/JF JS to advise JF re assembly of opt-in list in order to send an email update

Date	Staff	Amount of Time	Description
12/9/2016	JF	0.2	ME/JF Check in re email case update
12/9/2016	JF	0.3	Send out email update to opt-ins
12/9/2016	ME	0.2	JF/ME review sending case update to opt-ins
12/9/2016	ME	0.3	draft email with case update to send to opt-ins
12/12/2016	MS	2.1	drafting hours worked section of post hearing brief
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	MR	3.5	work on kellogg variable labor project outlining tasks and reviewing past work
12/12/2016	MS	0.9	drafting damages calcs section of post-hearing brief
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.2	rework response to opt-in responding to opt-in's concerns about status in this case for attorneys to review
12/12/2016	ME	0.1	ME/JF Check-in re opt-in response following the case update email sent out on 12/9
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	reply to opt-in's email about case update
12/12/2016	JS	1.6	Assist with formatting brief
12/12/2016	JF	0.1	ME/JF Check-in re opt-in response following the case update email sent out on 12/9
12/12/2016	ME	0.2	MS/ME review opt-in's concerns about status in case
12/12/2016	MS	0.5	reviewing damage calculations for settlement purposes
12/12/2016	MS	0.1	email to litigation team re experts
12/12/2016	ME	0.1	reply to opt-in's email about case update
12/12/2016	MS	0.2	MS/ME review opt-in's concerns about status in case
12/12/2016	MS	0.1	MS/ME discuss communicating with opt-in's about bankruptcy issue
12/12/2016	ME	0.1	email opt-in with update on bankruptcy issue
12/12/2016	ME	0.1	send email to MS about updating opt-ins about bankruptcy issue
12/12/2016	ME	0.2	draft response to opt-in in response to concerns about status in the case to send to attorneys for review
12/12/2016	MS	0.3	tc w/ J Boudreau re settlement and scheduling
12/12/2016	ME	0.1	MS/ME discuss communicating with opt-in's about bankruptcy issue
12/12/2016	JS	0.5	Assist with editing and proofing brief
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	JF	0.7	Correspond with Kellogg opt-ins who responded to email case update
12/12/2016	MS	0.5	t conf w/ potential expert, [ ]
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	MS	1.7	drafting willfulness argument section of post hearing brief
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	JS	0.3	Assist in formatting brief
12/12/2016	ME	0.1	email opt-in update about bankruptcy issue
12/12/2016	MS	1	review and revise post-hearing brief draft for circulation
12/13/2016	JF	0.6	JF/ME review inventory of data and testimony to be used for damages trial plan

Date	Staff	Amount of Time	Description
12/13/2016	JF	0.2	MR/JF Discuss hours worked in SN division as it relates to the inventory of data project
12/13/2016	ME	1.3	create spreadsheet of data and testimony inventory for damages trial plan
12/13/2016	ME	0.1	review document produced by document as it relates to trial preparation
12/13/2016	JF	0.1	ME/JF Check in re bankruptcy email update
12/13/2016	ME	0.1	listen to voicemail from opt-in in response to bankruptcy issue
12/13/2016	MS	0.2	respond to request re data for those outside sol
12/13/2016	JF	0.1	Forward an email from an opt-in to MS/MD/ME
12/13/2016	JF	0.2	Locate/email to ME excel spreadsheets used and/or compiled during the hours worked in SN and MF divisions project
12/13/2016	ME	0.1	ME/JF Check in re bankruptcy email update
12/13/2016	MS	0.1	MS/ME discuss including all opt-ins in inventory of data and testimony for trial preparation
12/13/2016	MS	0.1	MS/ME discuss responding to opt-in's bankruptcy attorney regarding value of claim
12/13/2016	ME	0.1	email MS about opt-in's bankruptcy concerns
12/13/2016	MR	0.2	MS/MR review most recent version of litigation risk damages .1, discuss document and TM hours project .1
12/13/2016	MR	3	continued work on kellogg production examination
12/13/2016	MR	1.2	read through various ESI deposition testimony regarding TM hours tracking
12/13/2016	MR	3.5	searched through document production for VL and related reports; searched through email production for same reports
12/13/2016	MS	1.1	research on experts, including review of cases
12/13/2016	MR	0.2	MR/JF Discuss hours worked in SN division as it relates to the inventory of data project
12/13/2016	ME	0.1	MR/ME discuss document produced by opt-in to prepare for trial
12/13/2016	ME	0.1	MS/ME discuss including all opt-ins in inventory of data and testimony for trial preparation
12/13/2016	JF	0.1	Send an email response to opt-in
12/13/2016	ME	0.1	email MS about opt-in's bankruptcy concerns
12/13/2016	JF	0.2	JF/MR discuss kellogg document project work
12/13/2016	MS	0.2	MS/MR review most recent version of litigation risk damages .1, discuss document and TM hours project .1
12/13/2016	ME	0.1	MS/ME discuss responding to opt-in's bankruptcy attorney regarding value of claim
12/13/2016	MR	0.1	MR/ME discuss document produced by opt-in to prepare for trial
12/13/2016	MR	0.2	JF/MR discuss kellogg document project work
12/13/2016	JF	0.2	MR/JF Review the outlines of the information necessary to begin the data inventory project for the trial expert
12/13/2016	ME	0.2	MR/ME review discovery information about GPS data for trial preparation
12/13/2016	MR	0.2	MR/JF Review the outlines of the information necessary to begin the data inventory project for the trial expert
12/13/2016	AN	0.1	Telephone call from plaintiff
12/13/2016	MR	0.2	MR/ME review discovery information about GPS data for trial preparation
12/13/2016	ME	0.6	JF/ME review inventory of data and testimony to be used for damages trial plan
12/13/2016	ME	0.2	save information received from deponent on file server
12/13/2016	ME	0.3	telephone call from opt-in regarding bankruptcy issue .2; notes from conversation .1

Date	Staff	Amount of Time	Description
			MS/MR review budget buster report .4, discuss methodology to establish TM
12/14/2016	MR	0.8	merchandising time .4
12/14/2016	MS	0.1	MS/JF Task to remove Kellogg files from Dan's office
12/14/2016	JF	0.1	ME/JF Discuss the timeframe for Data Inventory Meeting with MR
			perform web research on both expert witness prospects 1.0; send two emails to attys
12/14/2016	MR	1.4	about web cases found .2, examine prior emails regarding other possible expert, [ ] .2
			MS/MR review budget buster report .4, discuss methodology to establish TM
12/14/2016	MS	0.8	merchandising time .4
12/14/2016	ME	1.3	MR/JF/ME review data used to calculate Plaintiffs' merchandising time
			review kstars data .3, perform search/replace corrections for sample chunk of KSTARS
12/14/2016	MR	1.2	data .5, run hours tests on one chunk of data .4
12/14/2016	MR	2.5	read closely through pennington 1st deposition
12/14/2016	JF	0.1	MS/JF Task to remove Kellogg files from Dan's office
12/14/2016	MR	1.5	read through pennington 2nd depo and related exhibits
12/14/2016	MR	0.2	follow-up work investigating one aspect of itinerary reports
12/14/2016	MS	0.2	research on new ND CA FWW case
12/14/2016	MS	0.1	circulate expert resumes
12/14/2016	MR	2.8	inital work looking through details of itinerary reports including hidden sheets
12/14/2016	ME	0.1	ME/JF Discuss the timeframe for Data Inventory Meeting with MR
12/14/2016	MS	0.1	MS/ME discuss opt-in's concern regarding bankruptcy issue
12/14/2016	MR	0.1	send email about usefulness of Pennington 2nd depo to atty MS
12/14/2016	JF	1.3	MR/JF/ME review data used to calculate Plaintiffs' merchandising time
12/14/2016	ME	0.1	MS/ME discuss opt-in's concern regarding bankruptcy issue
12/14/2016	MR	0.1	send email to paras about usefulness of itinerary reports
12/14/2016	ME	0.1	telephone call from opt-in for case update
12/14/2016	MR	1.3	MR/JF/ME review data used to calculate Plaintiffs' merchandising time
12/15/2016	JF	3.1	Work on data inventory project
			review information that was compiled during summary judgment regarding opt-in
12/15/2016	ME	0.8	testimony of hours worked to determine what data to work from for trial preparation
12/15/2016	MR	3.5	examine and catalog itinerary report files as to what data each one has
			MS/MR in-depth review of itinerary report data related to damages 1.1. discussion of
12/15/2016	MR	1.4	expert witness discovery needs .3
12/15/2016	MS	0.7	review data for damage calcs
12/15/2016	ME	0.2	MR/ME/JF Meet to discuss the nuances of the data inventory project for trial expert
12/15/2016	JF	0.6	ME/JF Meet to discuss the inventory of data project
12/15/2016	MR	0.2	MR/ME/JF Meet to discuss the nuances of the data inventory project for trial expert
12/15/2016	ME	2.2	review opt-in interrogatory responses to identify testimony of hours worked
12/15/2016	JF	0.2	MR/ME/JF Meet to discuss the nuances of the data inventory project for trial expert
			prepare spreadsheets for paralegal team to work on to inventory opt-in interrogatory
12/15/2016	ME	0.5	testimony of hours worked
12/15/2016	MR	0.6	create dtsearch index for plaintiff depositions .2; create dtsearch index for defendant depositions .4
12/15/2016	JF	0.2	AG/JF Review data inventory project with AG
12/15/2016	MS	0.3	MS/ME review information needed to give expert for damages trial preparation

Date	Staff	Amount of Time	Description
			read through much of Keith Oldre's deposition, specifically relating to variable labor
12/15/2016	MR	0.5	control
12/15/2016	ME	0.1	left voicemail for opt-in - returning call
			MR/JF Meet to discuss what is needed to complete the data inventory project in order to
12/15/2016	JF	0.2	present it to the trial expert
12/15/2016	MD	0.2	MD/MR confer about defendant deponents who discussed variable labor responsibilities
12/15/2016	ME	0.3	MS/ME review information needed to give expert for damages trial preparation
12/15/2016	ME	0.2	return opt-in's telephone call regarding bankruptcy issue
12/15/2016	JF	0.3	Format spreadsheet re hours worked in MF (for attorney/expert review)
12/15/2016	ME	0.6	ME/JF Meet to discuss the inventory of data project
12/15/2016	MR	0.2	MD/MR confer about defendant deponents who discussed variable labor responsibilities
12/15/2016	AG	0.2	AG/JF Review data inventory project with AG
12/15/2016	JF	0.2	MS/JF Check-in re the data inventory project
			review using dtsearch index sections of plaintiff depos regard variable labor usage and
12/15/2016	MR	0.9	controls .3; do same for dependant depos .6
12/15/2016	JF	0.3	Assemble list of MorningFoods depositions (per MS's request)
12/15/2016	MS	2.2	legal research on J Leighton opinions on expert testimony
			MR/JF Meet to discuss what is needed to complete the data inventory project in order to
12/15/2016	MR	0.2	present it to the trial expert
12/15/2016	MS	0.2	MS/JF Check-in re the data inventory project
12/15/2016	ME	1.8	review opt-in interrogatory responses to identify testimony about hours worked
			MS/MR in-depth review of itinerary report data related to damages 1.1. discussion of
12/15/2016	MS	1.4	expert witness discovery needs .3
12/15/2016	AG	2	data inventory for trial expert
12/16/2016	MR	1.2	read through Powell deposition
			create spreadsheet that contains all opt-ins and division worked in to serve as tracking
12/16/2016	ME	1.7	for opt-in testimony regarding hours work for trial preparation
12/16/2016	CM	0.9	compile needed information from plaintiffs' interrogatories
12/16/2016	JF	0.8	Work on Expert Data Inventory project (MF depositions review)
12/16/2016	ME	0.3	ME/JF Meet re the data inventory project for expert review
12/16/2016	JF	1.1	Work to compile the spreadsheet re data inventory project
12/16/2016	MR	3.5	begin motus project on newest data produced by motus llc
12/16/2016	MS	1.2	drafting trial plan proof chart
12/16/2016	ME	0.1	ME/MR discuss developing plan for data and use of expert
12/16/2016	JF	0.1	ME/JF Check-in re the status of the inventory project
12/16/2016	JF	0.3	ME/JF Meet re the data inventory project for expert review
12/16/2016	ME	0.1	ME/JF Check-in re the status of the inventory project
12/16/2016	MS	0.4	review Hoton depo for Morning Foods testimony
12/16/2016	MR	0.1	ME/MR discuss developing plan for data and use of expert
			catalog remaining itinerary reports 1.2; catalog budget buster and variable labor reports
12/16/2016	MR	2.7	1.5
			CM/ME review task of identifying opt-in interrogatory testimony about hours worked to
12/16/2016	ME	0.1	prepare for trial
			update tracking spreadsheet to include whether or not opt-in testified about hours
12/16/2016	ME	3.8	worked for trial preparation



Date	Staff	Amount of Time	Description
12/16/2016	CM	0.1	CM/ME review task of identifying opt-in interrogatory testimony about hours worked to prepare for trial
12/19/2016	MR	7.1	Continued work on new Motus data project: Create date range .3; Sort and filter data .1; Troubleshoot duplicate record problem .7; Resort data develop 3 stages of dedupping data 3.6; Create framework for documenting .5; Redo date range .2; Create daily mileage sheet per employee .7, Create weekly mileage sheet per employee .7; Examine periods work outside of covered positions .3
12/19/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#427 - MINUTE ORDER SETTING TRIAL AND PRETRIAL DATES)
12/19/2016	JF	0.1	ME/JF Check-in re hours worked testimony of Snacks division of Kellogg
12/19/2016	ME	0.1	ME/JF Check-in re hours worked testimony of Snacks division of Kellogg
12/19/2016	ME	2.1	work on tracking information about opt-in rog testimony regarding hours for trial preparation
12/19/2016	JF	5.1	Work on data inventory project (Snacks division of Kellogg depositions review)
12/19/2016	ME	0.7	work on tracking information about opt-in rog testimony regarding hours for trial preparation
12/20/2016	MR	3.2	Work on scorecard study
12/20/2016	ME	0.5	get rid of duplicates in spreadsheet tracking opt-in testimony about hours worked to give to expert for trial preparation
12/20/2016	ME	0.2	ME/JF Check in re the status of the data inventory project in anticipation of expert review
12/20/2016	MR	3.2	Work on study comparing scorecard, variable labor reports and itinerary reports
12/20/2016	ME	0.7	join rog data spreadsheet and tracking spreadsheet of opt-in testimony to give to expert for trial preparation
12/20/2016	MR	0.2	MR/ME review joining of data in excel
12/20/2016	JF	1.8	Work on data inventory project (Snacks division of Kellogg depositions review)
12/20/2016	ME	0.3	work on compiling opt-in testimony about hours worked to give to expert for trial preparation
12/20/2016	ME	0.3	MS/ME review status of opt-in testimony to provide to expert for trial preparation
12/20/2016	ME	0.2	MR/ME review joining of data in excel
12/20/2016	JF	0.2	ME/JF Check in re the status of the data inventory project in anticipation of expert review
12/20/2016	MS	0.3	MS/ME review status of opt-in testimony to provide to expert for trial preparation
12/20/2016	MR	3.5	Work on Territory Manager hours model component writeup
12/20/2016	JF	0.1	Update opt-in's contact information
12/21/2016	ME	0.6	ME/JF Meet to discuss further process in the data inventory project
12/21/2016	MS	0.1	email to mr re damage calc for settlement demand
12/21/2016	MS	0.1	email to et re fees for settlement demand
12/21/2016	MS	0.2	ms/md discuss Boudreau request for settlement demand
12/21/2016	MS	1.1	legal analysis for post-SJ discount adjustments for new demand solicited by Kellogg
12/21/2016	MS	0.4	reviewing previous offer history to prepare for new offer solicited by Kellogg
12/21/2016	MS	0.3	tc w/ J Boudreau re settlement demand
12/21/2016	JF	0.6	ME/JF Meet to discuss further process in the data inventory project
12/21/2016	ME	1.4	compile opt-in testimony about hours worked for expert to prepare damages for trial
12/21/2016	MD	0.2	ms/md discuss Boudreau request for settlement demand

Date	Staff	Amount of Time	Description
12/21/2016	MS	1	MS/MD/JF/ME review information to prepare to respond to defendants' request for settlement
12/21/2016	JF	0.9	Finish review of depositions for information re hours worked in Snacks division of Kellogg (as part of Data Inventory project for Expert review)
12/21/2016	ME	1	MS/MD/JF/ME review information to prepare to respond to defendants' request for settlement demand
12/21/2016	MS	0.2	email to potential expert re timing on data
12/21/2016	JF	0.1	Email ME re completion of the deposition review part of the data inventory project
12/21/2016	MS	0.2	email to 2nd potential expert re timing on data
12/21/2016	MS	0.3	research on viable mediators for Kellogg settlement efforts
12/21/2016	CM	1.1	update case costs and fees for possible settlement
12/22/2016	MS	0.1	email to Campanelli counsel for mediator name
12/22/2016	JF	0.7	Review handwritten ROGS for relevant information re hours worked (expert data inventory project)
12/22/2016	MR	0.4	ms/mr discuss missing MF data quandry
12/22/2016	MS	0.3	ms/mr discuss Boudreau response to missing data
12/22/2016	MS	2.3	review discovery and excel data to determine whether MF data post Acosta is available
12/22/2016	MR	0.3	ms/mr discuss Boudreau response to missing data
12/22/2016	MS	0.1	review Campanelli docket for mediator identity
12/22/2016	ME	0.1	MS/ME discuss information regarding morning foods opt-ins for settlement purposes
12/22/2016	JF	0.9	Review handwritten ROGs (in preparation for Expert data inventory review)
12/22/2016	MS	0.1	MS/ME discuss information regarding morning foods opt-ins for settlement purposes
12/22/2016	MS	0.9	ms/mr discuss adjustments to damages for Kellogg solicited offer
12/22/2016	JF	0.1	ME/JF Check-in re data inventory project for expert review
12/22/2016	MR	0.1	send email to atty MD about past email to Defense Counsel
12/22/2016	MS	0.4	ms/mr discuss missing MF data quandry
12/22/2016	MS	0.2	respond to mr re NY interest damage issue given new 2nd Cir case on LDs
12/22/2016	MS	0.3	tc w/ J Boudreau re data needed for MF estimate
12/22/2016	MR	6.6	revised NY LD and Interest equations 1.5, checked over equations on summary page .6, revised adjustables in summary page 1.0, investigated extrapolations on summary page and supporting documents 1.5, made major revisions to extrapolations to allow opt-in and class adjustments 1.8, emailed team multiple times about changes .2
12/22/2016	MR	0.9	ms/mr discuss adjustments to damages for Kellogg solicited offer
12/22/2016	MR	0.6	continue to work on extrapolations .3, examine extrapolation 3 with regard to later MF work by opt-ins and class members .3
12/22/2016	MD	1	MS/MD/JF/ME review information to prepare to respond to defendants' request for settlement demand
12/22/2016	JF	1	MS/MD/JF/ME review information to prepare to respond to defendants' request for settlement demand
12/23/2016	MS	0.8	ms/mr discuss revisions necessary to data supporting damages model
12/23/2016	MS	0.4	ms/md discuss strategies for segregating MF claims given that Kellogg has not provided the necessary data
12/23/2016	MR	0.8	ms/mr discuss revisions necessary to data supporting damages model
12/23/2016	MD	0.4	ms/md discuss strategies for segregating MF claims given that Kellogg has not provided the necessary data

Date	Staff	Amount of Time	Description
12/23/2016	MR	1.7	continued work on revisions to damage calcs
12/23/2016	ME	0.1	reply to opt-in's email about case update
12/26/2016	MR	7.9	continued work on revised damage calcs reworking extrapolations 3.8; extensive work on detail sheets for extrapolations 4.1
12/27/2016	AG	0.2	ECF Filing of NOTICE of Change of Law Firm Name
12/27/2016	MR	3.7	continued work on damage calcs revising and rechecking various adjustables 3.3, transfer files to server .1, send detailed email to team about damage calc revisions .3
12/27/2016	MR	3.8	continued work on damage calcs rechecking all formulas
12/27/2016	ME	0.4	compile information about opt-ins as requested by MS for settlement purposes
12/28/2016	ME	0.3	MR/ME discuss nuances of opt-in damage calculations .1; and identifying opt-in's outside SOL .2
12/28/2016	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#428 - NOTICE of Change of Law Firm Name)
12/28/2016	MR	0.1	read and reply to email from atty MS about discounts in damage calcs
12/28/2016	MR	0.3	MR/ME discuss nuances of opt-in damage calculations .1; and identifying opt-in's outside SOL .2
12/29/2016	ME	1.4	update spreadsheet with opt-in testimony to give to expert for trial preparation
12/30/2016	ME	0.2	ME/JF Check-in re the update of the Expert Master spreadsheet (data inventory project)
12/30/2016	JF	3.8	Update the data inventory Expert Master spreadsheet (MF declarations, deposition excerpts, handwritten ROGs)
12/30/2016	JF	0.2	ME/JF Check-in re the update of the Expert Master spreadsheet (data inventory project)
12/30/2016	ME	0.2	ME/JF Review of the spreadsheet to be submitted to the expert (pre-trial preparation)
12/30/2016	ME	0.1	telephone call from opt-in for case update
12/30/2016	ME	0.3	draft case update for team to review
12/30/2016	ME	0.1	verify opt-in's interrogatory responses for trial preparation
12/30/2016	JF	0.1	ME/JF Check in re case management (Kellogg tasks to be completed)
12/30/2016	ME	0.1	ME/JF Check in re case management (Kellogg tasks to be completed)
12/30/2016	JF	0.2	ME/JF Review of the spreadsheet to be submitted to the expert (pre-trial preparation)
1/3/2017	ME	1.3	MD/MS/JF/ME conduct risk analysis to prepare settlement demand
1/3/2017	MS	0.2	email to mr re issues on segmented damages
1/3/2017	MS	0.5	drafting variable adjustments for damages revisions
1/3/2017	MS	0.1	MS/ME discuss scheduling team meeting to review settlement demand
1/3/2017	ME	0.1	MS/ME discuss scheduling team meeting to review settlement demand
1/3/2017	ME	0.1	schedule team meeting to discuss settlement demand
1/3/2017	MD	1.3	MD/MS/JF/ME conduct risk analysis to prepare settlement demand
1/3/2017	MS	1.2	revising damages sheets to account for separate damages and identifying issues
1/3/2017	ME	0.1	ME/JF Check-in re the data inventory project (for expert review in anticipation of the trial)
1/3/2017	JF	0.1	ME/JF Check-in re the data inventory project (for expert review in anticipation of the trial)
1/3/2017	JF	1.3	MD/MS/JF/ME conduct risk analysis to prepare settlement demand
1/3/2017	MS	1.3	MD/MS/JF/ME conduct risk analysis to prepare settlement demand

Date	Staff	Amount of Time	Description
1/4/2017	MR	1	examine and fix atty's tallies of damages from latest damage calcs sheet 1.0
			work on KSTARS: fix 21 csv files to strip problem commas 3.1, create excel binary files of the 21 CSV files .5, import trial csv into SQL .5, combine csv files into single file .5, attempt to strip out header lines in 20 of 21 csv files .5, zip combined file and copy to external
1/5/2017	MR	5.2	drive .1
			MS/MD/ME/JF Meet re Rational Settlement Value forecast in anticipation of potential
1/6/2017	JF	0.8	mediation
			MS/MD/ME/JF Meet re Rational Settlement Value forecast in anticipation of potential
1/6/2017	MD	0.8	mediation
			MS/MD/ME/JF Meet re Rational Settlement Value forecast in anticipation of potential
1/6/2017	ME	0.8	mediation
			MS/MD/ME/JF Meet re Rational Settlement Value forecast in anticipation of potential
1/6/2017	MS	0.8	mediation
1/6/2017	JF	0.5	Call from opt-in re case update (explanation of legal terms)
1/6/2017	JF	0.2	Call to opt-in following her email (allocation of VL)
1/7/2017	MR	3.2	Continue work on developing SQL queries for KSTARS
			continue to work on SQL queries for KSTARS 3.0 for average case qty and average merch hours 1.3, develop sum and case routines 2.0, test use of hours fields in queries .7,
1/8/2017	MR	6	attempt to compare KSTARS data to Scorecards 1.9, save queries to archive folder .1
			begin work on fixing KSTARS SQL missing row and column formatting problems using
1/9/2017	MR	6.2	emeditor to strip LF/CR (leave last step running overnight)
			install new hard drive required for work on voluminous KSTARS data 1.0, pull sample data
1/9/2017	MR	2.3	for territories, zones etc. 1.3
			continue to analyze KSTARS data 1.4, initial examination of comparison between KSTARS
1/10/2017	MR	2.8	data and Budget Buster report 1.4
			Rebuild KSTARS SQL database using amended csv file to fix LF/CR field problem and
1/10/2017	MR	3.4	column format problem both of which resulted in omitted data
1/11/2017	MR	2.4	continue to review Budget Buster data to KSTARS data
1/11/2017	MR	0.1	send email to atty MS to update progress on TM hours project
1/12/2017	MR	0.7	MS/MR Discuss results of indepth data study .7
			enter declaration testimony about hours worked into spreadsheet for expert to prepare
1/12/2017	ME	1	for trial
1/12/2017	ME	0.1	schedule team meeting
			enter deposition testimony about hours worked into spreadsheet for expert to prepare
1/12/2017	ME	1.3	for trial
1/12/2017	ME	0.1	email team about weekly meetings
			Look for past notes on scorecard study .2, Continued work on scorecard study 1.5, Kstars 2014 VL hours comparison to 2011 scorecard VL totals 1.2, Kstars total compared with 1st
1/12/2017	MR	4.9	half and 1qtr Budget buster 1.9; draft notes of work done .1,
			Redo sql queries for 1Q2014 per zone and per sales districts to compare against Buster
1/12/2017	MR	0.7	Buster VL figures
			enter testimony from happy camper declarations about hours worked into spreadsheet
1/12/2017	ME	0.9	for expert to prepare for trial
1/12/2017	MS	0.7	MS/MR Discuss results of indepth data study .7
1/13/2017	ME	0.1	email team about review case update draft
			MD/ME review KSTAR data to prepare for meeting to review damage information for
1/13/2017	MD	0.2	expert
1/13/2017	MR	1.4	MD/MS/JF/MR/ME review trial plan for proving damages
1/13/2017	MS	1.4	MD/MS/JF/MR/ME review trial plan for proving damages

Date	Staff	Amount of Time	Description
1/13/2017	JF	1.4	MD/MS/JF/MR/ME review trial plan for proving damages
1/13/2017	MD	1.4	MD/MS/JF/MR/ME review trial plan for proving damages
1/13/2017	MR	0.3	draft memo for team about benefits of using an expert if we want to use KSTARS data
1/13/2017	ME	1.4	MD/MS/JF/MR/ME review trial plan for proving damages
1/13/2017	MR	0.1	Send email to atty MS about new information regarding Kellogg data and use of expert
1/13/2017	ME	0.2	MD/ME review KSTAR data to prepare for meeting to review damage information for expert
1/17/2017	JF	0.2	Compose an email re client inquiry
1/18/2017	ME	0.2	ME/JF Check-in re potential trial witness research
1/18/2017	ME	0.7	review deposition digests of plaintiff testimony to identify potential trial witnesses
1/18/2017	ME	1.3	review plaintiff depositions to identify potential trial witnesses
1/18/2017	JF	0.2	ME/JF Check-in re potential trial witness research
1/18/2017	ME	0.5	put together short list of potential plaintiff witnesses for trial and identify which division they worked in
1/18/2017	MS	0.5	md/ms discuss damages model
1/18/2017	MS	0.5	md/ms discuss damages model
1/18/2017	MR	0.2	Read and reply to MS email about Kellogg's variable labor model .2
1/18/2017	MS	0.4	ms/mr discuss data needed for GPS/Motus analysis
1/18/2017	MR	0.4	ms/mr discuss data needed for GPS/Motus analysis
1/19/2017	ME	0.2	ME/JF Discuss project to choose potential trial witnesses
1/19/2017	JF	5.6	Review deposition digests to assist in the process to choose potential trial witnesses
1/19/2017	JF	0.2	ME/JF Discuss project to choose potential trial witnesses
1/19/2017	ME	0.1	search for printed copy of deposition transcript
1/19/2017	MS	0.4	review notes DMs telling KSRs that their work is 11-12 hours a day and circulating a strategy for addressing
1/19/2017	MS	3.2	review and annotation of first Pennington depo for direct testimony outline
1/19/2017	ME	0.1	MS/ME discuss following up with opt-in about case information
1/19/2017	ME	0.1	telephone call from opt-in about case update
1/19/2017	MR	0.6	Compose detailed email with sample data for atty MS to clarify the limited TM drive and work time information we have
1/19/2017	MS	0.1	MS/ME discuss following up with opt-in about case information
1/19/2017	MR	0.1	Read and reply to MS regarding knowledge of overlap between Itinerary report miles information and Motus data
1/19/2017	ME	0.1	MS/ME discuss location of print version of deposition transcript
1/19/2017	ME	0.1	JF/ME review varying formats of deposition digests
1/20/2017	MR	0.5	ms/mr discuss mileage data and strategy for testing and use in trial
1/20/2017	MS	0.5	ms/mr discuss mileage data and strategy for testing and use in trial
1/20/2017	MR	0.3	examine motus data before meeting with atty MS
1/20/2017	MR	0.4	Locate and examine client's calendar work and mileage journals .3, email links of same to team with comments .1
1/20/2017	MS	0.2	review opt in logs with mileage records
1/23/2017	ME	0.3	research information about opt-in to determine if he could be potential trial witness
1/23/2017	MS	0.2	review rog responses for potential testifying witness
1/23/2017	JF	2.9	Review the deposition digests to aid in the selection of witnesses for the trial
1/23/2017	ME	0.2	JF/ME review status of project to identify potential trial witnesses

Date	Staff	Amount of Time	Description
1/24/2017	MS	0.3	review deponent analysis for trial witnesses
1/24/2017	ME	4.6	work on updating spreadsheet with information about potential plaintiff witnesses for trial
1/24/2017	MS	0.1	MS/ME discuss adding information to spreadsheet to track potential witnesses for trial
1/24/2017	JF	0.1	ME/JF Check-in re plaintiffs' review process to function as witnesses
1/24/2017	ME	0.1	MS/ME discuss adding information to spreadsheet to track potential witnesses for trial
1/24/2017	MR	1.5	initial work to review and catalog all produced Motus data 1.5
1/24/2017	JF	0.1	JF/ME discuss project for selecting potential trial witnesses
1/24/2017	ME	0.1	JF/ME discuss project for selecting potential trial witnesses
1/24/2017	ME	0.1	ME/JF Check-in re plaintiffs' review process to function as witnesses
1/25/2017	JF	0.3	Speak with plaintiff in the case re collections agency issue
1/25/2017	ME	0.2	ms/me discuss identifying deponents who participated in WB study
1/25/2017	MS	0.2	ms/me discuss identifying deponents who participated in WB study
1/25/2017	MS	0.1	MS/ME review project for identifying deponents that were involved in defendant's time study
1/25/2017	ME	0.2	work to identify deponents who were involved in WB time study
1/25/2017	MS	0.5	develop proof chart for trial issues
1/25/2017	MS	0.5	draft trial narrative
1/25/2017	ME	0.1	reply to opt-in's email about updated contact information
1/25/2017	MS	0.2	MS/ME review method for tracking documents that are useful for trial
1/25/2017	MS	0.3	review WB RSR survey data
1/25/2017	ME	0.2	MS/ME review method for tracking documents that are useful for trial
1/25/2017	MS	0.3	review WB Best practices report
1/25/2017	MS	0.3	review WB Store survey
1/25/2017	ME	0.8	update trial witnesses tracking spreadsheet to include information about region and territory
1/25/2017	ME	0.1	MS/ME review project for identifying deponents that were involved in defendant's time study
1/25/2017	ME	0.1	study
1/25/2017	MS	0.3	review WB t conf
1/25/2017	MS	0.1	email to team re format for updated Kellogg data
1/25/2017	MS	0.3	email to J Boudreau re settlement demand and data including review of calculations
1/25/2017	MS	0.9	study WB 9-13-13 report
1/25/2017	ME	0.1	MS/ME discuss how defendant's production fits into trial plan
1/25/2017	MS	0.1	MS/ME discuss how defendant's production fits into trial plan
1/25/2017	MS	0.8	study WB [ ] report
1/25/2017	MS	0.6	study WB [ ] report
1/26/2017	MS	2.1	analysis of Kellogg industrial study sampling
1/26/2017	MS	1.1	analyze variable labor reports for patterns on Kellogg assumptions
1/26/2017	MS	0.5	ms/mr discuss analysis of variable labor reports wrt Kellogg variable labor assumptions
1/26/2017	MR	0.4	MS/MR Discuss variable labor reports and industrial time and work studies
1/26/2017	MS	1.8	draft intro sections of trial narrative and annotate with evidence
1/26/2017	MS	0.4	MS/MR Discuss variable labor reports and industrial time and work studies
1/26/2017	MR	0.5	ms/mr discuss analysis of variable labor reports wrt Kellogg variable labor assumptions
1/27/2017	MD	0.1	ms/md discuss request for data for settlement
1/27/2017	MS	0.1	ms/md discuss request for data for settlement



Date	Staff	Amount of Time	Description
1/27/2017	MD	0.2	read/comment on MS email to boudreau re damages
1/27/2017	MR	0.2	ms/mr discuss inclusion of state law sol in definition of data requested to make demand
1/27/2017	MS	0.2	ms/mr discuss inclusion of state law sol in definition of data requested to make demand
1/27/2017	MD	0.2	ms/md review Bain studies and strategy for dealing with Kellogg change of practices
1/27/2017	MS	0.2	ms/md review Bain studies and strategy for dealing with Kellogg change of practices
1/27/2017	MS	0.2	incorporate changes into wage-and-hour data request
1/27/2017	MS	0.8	review Whitaker deposition re data collection and storage
1/27/2017	MS	1	review Dumbkiewicz 1-14-15 depo
1/30/2017	MS	0.8	review itineraries for ways to determine mile data for comparison to mileage records
1/30/2017	ME	0.2	read minute order setting trial and pre trial dates
1/30/2017	MS	0.6	review of Whitaker depo for trial evidence issues
1/30/2017	MS	0.3	emails to mr re itinerary and related files for mileage comparisons
1/30/2017	ME	0.1	MS/ME discuss documents related to mileage tracking
1/30/2017	MS	0.1	MS/ME discuss documents related to mileage tracking
1/30/2017	MS	0.7	review of Clifton deposition
1/30/2017	MS	0.2	emails to MR re mileage records available for damages analysis
1/30/2017	MS	0.7	analysis of mileage records available and possible analysis for damages
1/30/2017	ME	0.6	locate documents related to opt-in mileage tracking
1/31/2017	MR	0.1	read and reply to MS email about itinerary / motus matchup .1
1/31/2017	MR		locate 20 itineraries for possible matchup .3, modify files by unhiding spreadsheets 2.2, 2.7 move files to specified folder .1, email team about additional itineraries .1
1/31/2017	ME	0.1	left voicemail from opt-in to follow up about previous call regarding case information
1/31/2017	ME	0.2	telephone call from opt-in about case information
2/1/2017	MR	0.1	send email to team for followup of prior email re additional itineraries
2/1/2017	MS	0.1	MS/ME discuss if minute order for trial date should be posted along with case update
2/1/2017	ME	0.1	MS/ME discuss if minute order for trial date should be posted along with case update
2/1/2017	MR	0.1	send 2nd followup email to atty MS re additional itineraries
2/1/2017	ME	0.5	respond to emails from opt-ins about case updates
2/1/2017	ME	0.1	MS/ME discuss reviewing case update to be posted to the website
2/1/2017	MS	0.1	MS/ME discuss reviewing case update to be posted to the website
2/1/2017	JF	0.1	ME/JF Check-in re recent email exchanges re data inventory (mileage tracking)
2/1/2017	ME	0.3	post case update to website
2/1/2017	ME	0.1	ME/JF Check-in re recent email exchanges re data inventory (mileage tracking)
2/1/2017	ME	0.1	telephone call with opt-in for case update
2/2/2017	MS	3.2	data comparison for mileage critique
2/2/2017	MR	2.6	work on motus files 330959-330961 individual comparative date ranges of files
2/2/2017	MR	0.7	revise and annotate motus data files info and dates of production .6, sent out to team .1
2/2/2017	ME	0.1	schedule team meeting for trial planning
2/2/2017	MS	1.1	review of additional itineraries for application to damage theories
2/2/2017	MR	0.1	MS/MR discuss follow-up of Kellogg motus data

Date	Staff	Amount of Time	Description
2/2/2017	MS	0.1	MS/MR discuss follow-up of Kellogg motus data
2/2/2017	MS	0.5	ms/md discuss use of mileage data for damage trial evidence
2/2/2017	MD	0.5	ms/md discuss use of mileage data for damage trial evidence
2/3/2017	MR	1.5	continue work on motus data files comparisons
2/3/2017	MS	1.1	review of Clifton depo for details on WB study and CRS
2/3/2017	MS	0.9	bussell depo review for industrial study and work duty testimony
2/5/2017	MR	2.1	examine prior work on Motus C and D group of data .4, investigate various approaches to identify first and last travel legs of the day 1.7
2/6/2017	MR	1.9	read email from MS about industrial time studies .1, examine links provided by MS to studies (including tracking down link problem) .3, search in document collections for other time study information .5, examine time studies and related documents for drive time estimates .9, send email regarding time studies to team .1
2/6/2017	ME	0.5	locate sources of information about complete list of zone locations to assist with trial preparation
2/6/2017	ME	0.1	review notes about potential trial witnesses to prepare for team meeting
2/6/2017	MS	0.2	MS/JF Meet re potential project (calculation of miles drives, Motus data)
2/6/2017	MS	0.4	review mileage databases located by mr
2/6/2017	MS	0.8	MS/MR/JF Meet re Motus data vs miles estimates project
2/6/2017	MR	0.8	MS/MR/JF Meet re Motus data vs miles estimates project
2/6/2017	ME	0.1	ME/JF Quick check-in re the Motus data vs. miles driven project
2/6/2017	MS	0.4	analysis of how mileage databases provided by mr fit into prior database analysis
2/6/2017	JF	0.8	MS/MR/JF Meet re Motus data vs miles estimates project
2/6/2017	JF	0.1	ME/JF Quick check-in re the Motus data vs. miles driven project
2/6/2017	ME	1.1	MS/MD/MR/JF/ME discuss process for continuing to identify plaintiff witnesses for trial .5; discuss trial plan for proving damages .4; discuss trial plan for proving liability .2
2/6/2017	MS	0.3	draft plan for analyzing additional mileage databases for damages analysis and circulate
2/6/2017	MS	0.2	review and respond to mr email re RSR W industrial study
2/6/2017	MS	1.1	MS/MD/MR/JF/ME discuss process for continuing to identify plaintiff witnesses for trial .5; discuss trial plan for proving damages .4; discuss trial plan for proving liability .2
2/6/2017	JF	1.1	MS/MD/MR/JF/ME discuss process for continuing to identify plaintiff witnesses for trial .5; discuss trial plan for proving damages .4; discuss trial plan for proving liability .2
2/6/2017	MD	1.1	MS/MD/MR/JF/ME discuss process for continuing to identify plaintiff witnesses for trial .5; discuss trial plan for proving damages .4; discuss trial plan for proving liability .2
2/6/2017	MR	1.1	MS/MD/MR/JF/ME discuss process for continuing to identify plaintiff witnesses for trial .5; discuss trial plan for proving damages .4; discuss trial plan for proving liability .2
2/6/2017	ME	0.1	listen to voicemail from opt-in
2/6/2017	MR	0.3	read email from MS about mileage and Motus concern .1, send email with responses to points made by MS .2
2/6/2017	MR	1.2	Mileage project work: Locate information for sales district names and codes .3, create index for sales district names and codes .3, review and reformat cross-reference of reps and territories over time .3, create lookup table for rep, date and territory covered .3

Date	Staff	Amount of Time	Description
2/6/2017	MD	1.5	review list of plaintiffs to testify at trial
2/6/2017	MR	0.1	read and reply to email from atty MS about Motus C and D group data
2/6/2017	JF	0.2	MS/JF Meet re potential project (calculation of miles drives, Motus data)
2/7/2017	MS	0.2	review intake from KSR who participated on conference call re hours
2/7/2017	ME	0.2	MD/ME discuss additional information needed for project to identify plaintiff witnesses for trial
2/7/2017	MD	0.2	MD/ME discuss additional information needed for project to identify plaintiff witnesses for trial
2/7/2017	ME	0.4	telephone call from opt-in about case .3; notes from conversation .1
2/7/2017	MR	0.7	MR/JF Review the task to compile itineraries of hours driven in preparation for the trial
2/7/2017	JF	0.7	MR/JF Review the task to compile itineraries of hours driven in preparation for the trial
2/7/2017	JF	0.1	MR/JF Meet re review of additional itinerarites of the miles driven project in anticipation of the trial
2/7/2017	MS	0.1	Discuss factors to consider for identifying potential witnesses for trial
2/7/2017	ME	0.1	Discuss factors to consider for identifying potential witnesses for trial
2/7/2017	MR	7.8	Mileage project work: review work by para JF to compile itinerary mileage charts .2, modify compiled excel sheet of mileage charts to normalize formatting 1.5, sort data .1, create lookup table .5, eliminate problem entries .3, create first version of Motus group C & D (new data) comparison of weekly mileage with itinerary mileage charts 2.0, implement approaches to avoid adding first and last travel leg mileage for each day .6, create second version of Motus group C & D (new data) comparison of weekly mileage with itinerary mileage charts without first and last travel leg mileage 1.5, examine results .3, run various tests on itinerary travel chart data regarding frequency of territory mileage updates .6, send email to team regarding motus and itinerary chart comparison results and frequency of updates of territory mileage .2
2/7/2017	ME	0.2	MR/ME discuss RSR time study and territory size
2/7/2017	MR	0.1	MR/JF Meet re review of additional itinerarites of the miles driven project in anticipation of the trial
2/7/2017	ME	0.6	review client testimony to support attorney analysis of time studies for trial preparation
2/7/2017	JF	2.1	Compile itineraries of hours driven into an excel spreadsheet to prepare evidence for the trial
2/7/2017	MR	0.2	MR/ME discuss RSR time study and territory size
2/8/2017	MR	1.2	create presentational version of weekly mileage comparison between Motus C/D group and itineraries
2/8/2017	MS	0.3	MS/MR discuss use of Motus/mileage data
2/8/2017	MR	0.3	MS/MR discuss use of Motus/mileage data
2/8/2017	ME	0.1	reply to intake's email about joining case
2/8/2017	MR	0.1	JK/MR discuss Kellogg motus work issues
2/8/2017	JK	0.1	JK/MR discuss Kellogg motus work issues
2/9/2017	MR	5.4	combine two datasets of Motus daily mileage (Group F) 1.0, check date ranges .2, check for duplicate records .3, incorporate formulas to obtain weekly data .8, pull in lookup tables for territories worked and itinerary mileage data .5, incorporate formulas to perform lookups 1.0, perform various formatting and presentational modifications 1.0, review results .3, compare Motus weekly mileage totals to those weekly totals from Group C/D analysis .3
2/9/2017	MD	0.1	respond to client about changes to snack division 0.1

Date	Staff	Amount of Time	Description
2/9/2017	MD	0.1	email litigation team re Kellogg changes to snack division 0.1
2/9/2017	MR	3.9	combine four Motus datasets (group B, produced 4/28/2016) 1.2, perform numerous tests and methods to eliminate duplicate records 2.7
2/10/2017	JF	0.2	Call to plaintiff re potential re-distribution of Kellogg divisions
2/10/2017	MS	0.1	MS/MR update on yesterday's Motus work and results
2/10/2017	ME	0.2	MS/ME discuss information needed regarding Kellogg's change in practices
2/10/2017	ME	0.6	telephone call from opt-in about reorganization .4; notes from conversation .2
2/10/2017	ME	0.1	MR/ME discuss meeting agenda and scheduling a follow up meeting for next week
2/10/2017	JF	0.2	JF/ME review history of reorganization and change of job titles within Kellogg
2/10/2017	MR	0.2	ms/mr discuss use of MOTUS data for anecdotal evidence
2/10/2017	MR	0.1	MS/MR update on yesterday's Motus work and results
2/10/2017	ME	0.4	tc from opt-in about Kellogg change in practices .2; notes from conversation .2
2/10/2017	MR	0.1	MR/ME discuss meeting agenda and scheduling a follow up meeting for next week
2/10/2017	ME	0.1	JF/ME discuss call from opt-in about company's reorganization
2/10/2017	MD	0.6	MD/MS/JF/ME discuss responding to clients about reorganizing .3; and developing an intake for potentially filing a new case .3
2/10/2017	JF	0.1	Call with Kellogg plaintiff re potential layoffs
2/10/2017	ME	0.2	ME/JF Discuss the meeting topics (potential redistribution/layoffs of plaintiffs)
2/10/2017	ME	0.2	JF/ME review history of reorganization and change of job titles within Kellogg
2/10/2017	JF	0.6	MD/MS/JF/ME discuss responding to clients about reorganizing .3; and developing an intake for potentially filing a new case .3
2/10/2017	MS	0.6	MD/MS/JF/ME discuss responding to clients about reorganizing .3; and developing an intake for potentially filing a new case .3
2/10/2017	MS	0.2	ms/mr discuss use of MOTUS data for anecdotal evidence
2/10/2017	ME	0.1	listen to voicemail from opt-in
2/10/2017	MR	3.7	continued work on Motus group b data additional steps to identify and remove duplicates
2/10/2017	ME	0.1	schedule team meeting to discuss trial strategy
2/10/2017	ME	0.6	MD/MS/JF/ME discuss responding to clients about reorganizing .3; and developing an intake for potentially filing a new case .3
2/10/2017	MS	0.2	MS/ME discuss information needed regarding Kellogg's change in practices
2/10/2017	ME	0.1	schedule meeting to discuss how paralegals should handle calls from clients about reorganization
2/10/2017	JF	0.2	ME/JF Discuss the meeting topics (potential redistribution/layoffs of plaintiffs)
2/13/2017	ME	0.2	ME/JF Discuss how to handle phone inquiries re upcoming Kellogg reorganization
2/13/2017	ME	0.3	draft email to opt-in about status of RSMs in case for attorneys to review
2/13/2017	ME	0.1	email claimant about setting up time to discuss company restructure
2/13/2017	ME	1.1	draft intake form for possible new case
2/13/2017	ME	0.1	draft list of questions to ask opt-ins who call about company transition
2/13/2017	ME	0.1	email team about late consent to sue
2/13/2017	JF	0.1	Update spreadsheet to track calls re upcoming Kellogg reorganization
2/13/2017	ME	0.1	sent email to opt-in to set up a time to talk about company restructure
2/13/2017	CLER	0.1	create PDF format of document recd (CTS)
2/13/2017	CLER	0.1	Data Entry of contact information
2/13/2017	JF	0.2	ME/JF Discuss how to handle phone inquiries re upcoming Kellogg reorganization

Date	Staff	Amount of Time	Description
2/13/2017	CM	0.1	CM/JF Discuss the volume of potential plaintiff calls re prospective re-structuring of/layoffs from Kellogg
2/13/2017	ME	0.1	attempt to return call to opt-in regarding company restructure
2/13/2017	MR	4.7	identify likely home designations in From Location, To Location and purpose columns for 900K+ rows of Motus B-group data
2/13/2017	JF	0.1	CM/JF Discuss the volume of potential plaintiff calls re prospective re-structuring of/layoffs from Kellogg
2/14/2017	MD	0.2	email bankruptcy attorney requested documents 0.2
2/14/2017	ME	0.1	document call from claimant about company restructure in tracking spreadsheet
2/14/2017	ME	0.1	reply to email from opt-in concerned about status in case
2/14/2017	MD	0.3	call with bankruptcy attorney re claim 0.3
2/14/2017	MD	0.2	MD/ME discuss status of late consents to sue
2/14/2017	ME	0.2	tc from opt-in about status in this case
2/14/2017	ME	0.2	MD/ME discuss status of late consents to sue
2/14/2017	MR	0.2	examine draft intake form and email commentary about it .1, email suggested addition to team .1
2/14/2017	JF	0.3	Call with a former employee re re-structuring of Kellogg
2/14/2017	JF	0.1	JF/ME discuss responding to opt-ins about questions they have about company restructure
2/14/2017	ME	0.1	ME/MR confer on questionnaire regarding question of severance
2/14/2017	MR	0.1	MR/ME discuss question to add to preliminary intake form for potential new case
2/14/2017	MR	0.1	ME/MR confer on questionnaire regarding question of severance
2/14/2017	ME	0.3	telephone call from opt-in about company restructure .2; notes from conversation .1
2/14/2017	ME	0.1	JF/ME discuss responding to opt-ins about questions they have about company restructure
2/14/2017	ME	0.1	respond to opt-in's email about scheduling time to talk about company restructure
2/14/2017	ME	0.1	email JF about availability to return call to opt-in about company restructure
2/14/2017	ME	0.2	reply to email from opt-in about status in the case
2/14/2017	MR	0.1	MR/JF Discuss the recent news concerning upcoming re-structuring of/at Kellogg
2/14/2017	MR	0.4	look up what information we have on class member for para ME .3, send link and info for ME to examine personnel history for class member .1
2/14/2017	MR	4.3	implement lookups for from-home and to-home for mileage calculations without commute 1.8, create cumulative columns for daily mileage 1.5, create cumulative columns for weekly mileage 1.0
2/14/2017	JF	1.3	Work on potential trial witness list
2/14/2017	ME	0.1	MR/ME discuss question to add to preliminary intake form for potential new case
2/14/2017	ME	0.1	email MD about opt-in's questions about status in case
2/14/2017	MD	0.5	review data for selection of trial witnesses
2/14/2017	MD	0.1	MD/MR phone discuss damages for opt-in who is in bankruptcy
2/14/2017	MD	0.3	look up damages for opt-in who is in bankruptcy .2, email to MD about same .1
2/14/2017	JF	0.1	MR/JF Discuss the recent news concerning upcoming re-structuring of/at Kellogg
2/14/2017	MR	0.1	MD/MR phone discuss damages for opt-in who is in bankruptcy
2/14/2017	MS	0.1	MS/ME discuss rescheduling team meeting

Date	Staff	Amount of Time	Description
2/14/2017	JF	0.7	Call with claimant re re-structuring of Kellogg
2/14/2017	ME	0.1	MS/ME discuss rescheduling team meeting
2/14/2017	ME	0.4	ME/JF Review the project to compile more information re potential trial witnesses
2/14/2017	JF	0.4	ME/JF Review the project to compile more information re potential trial witnesses
2/14/2017	ME	0.1	leave voicemail for intake regarding late consent to sue
2/14/2017	ME	0.2	MR/ME discuss information provided on class list
2/14/2017	ME	0.1	email JF about project to identify potential witnesses
2/14/2017	ME	0.9	research information about person who filed late consent to sue
2/14/2017	ME	0.2	ME/JF Check-in re additional research to locate additional trial witnesses
2/14/2017	MR	0.2	MR/ME discuss information provided on class list
2/15/2017	MS	0.3	MS/MR check-in on meeting topics .1, case developments .1, Motus data work .1
2/15/2017	JS	0.3	Call for update
2/15/2017	MD	1.5	research representative testimony for trial
2/15/2017	ME	0.9	MR/JF/MD/MS/ME discuss Kellogg's restructuring as it relates to current litigation .2; discuss options for filing a new case and intakes .5; provide update on data analysis for trial preparation .1; provide update of project to identify witnesses .1
2/15/2017	JF	0.1	MD/JF Consult MD re phone call with plaintiff about upcoming re-structuring of Kellogg and its impact on plaintiffs
2/15/2017	ME	0.3	MD/ME discuss following up with intake who sent CTS past the period to join
2/15/2017	MR	2.9	create weekly mileage workbook .2, add territory information 1.0, add itinerary sheet mileage information .8, fix issue of weekly mileage totaling .8, calculate averages .1
2/15/2017	MD	0.1	MD/ME discuss locating detailed opt-in information to assist with the process of selecting witnesses for trial
2/15/2017	MR	0.1	MD/MR discuss potential uses of Motus data
2/15/2017	MR	0.3	MS/MR check-in on meeting topics .1, case developments .1, Motus data work .1
2/15/2017	MD	0.1	MD/MR discuss potential uses of Motus data
2/15/2017	MD	1	review data for selection of witnesses for trial
2/15/2017	JF	0.9	MR/JF/MD/MS/ME discuss Kellogg's restructuring as it relates to current litigation .2; discuss options for filing a new case and intakes .5; provide update on data analysis for trial preparation .1; provide update of project to identify witnesses .1
2/15/2017	MR	0.9	MR/JF/MD/MS/ME discuss Kellogg's restructuring as it relates to current litigation .2; discuss options for filing a new case and intakes .5; provide update on data analysis for trial preparation .1; provide update of project to identify witnesses .1
2/15/2017	JF	0.6	Speak with plaintiff on the phone re Kellogg re-structuring/impact on plaintiffs
2/15/2017	MD	0.3	MD/ME discuss following up with intake who sent CTS past the period to join
2/15/2017	ME	0.1	MD/ME discuss locating detailed opt-in information to assist with the process of selecting witnesses for trial
2/15/2017	MD	0.9	MR/JF/MD/MS/ME discuss Kellogg's restructuring as it relates to current litigation .2; discuss options for filing a new case and intakes .5; provide update on data analysis for trial preparation .1; provide update of project to identify witnesses .1



Date	Staff	Amount of Time	Description
2/15/2017	MD	0.1	MD/JF Consult MD re phone call with plaintiff about upcoming re-structuring of Kellogg and its impact on plaintiffs
2/15/2017	MS	0.9	MR/JF/MD/MS/ME discuss Kellogg's restructuring as it relates to current litigation .2; discuss options for filing a new case and intakes .5; provide update on data analysis for trial preparation .1; provide update of project to identify witnesses .1
2/16/2017	ME	0.1	telephone call to intake who sent consent to sue after time to join has ended
2/16/2017	ME	0.4	telephone call with intake to review preliminary questionnaire
2/16/2017	CLER	0.1	create PDF format of CTS recd.
2/16/2017	MR	1.3	manually examine Group B Motus data for patterns and potential use
2/16/2017	CLER	0.1	Data Entry of contact information
2/17/2017	CLER	0.1	create PDF format of CTS recd
2/17/2017	CLER	0.1	Data Entry of contact information
2/17/2017	ME	0.4	locate information about merchandising survey .3; email information to team .1
2/17/2017	ME	1.4	review opt-in testimony to support damages at trial
2/17/2017	MS	0.2	circulate email on issues raised by new opt in
2/17/2017	ME	0.2	draft list of damage proof for trial to circulate to the team .2
2/17/2017	MS	0.2	email to litigation team re add'l discovery from Kellogg
2/17/2017	MS	0.5	draft letter to Boudreau re 26(e) discovery
2/17/2017	MS	0.2	review new opt-in intake
2/19/2017	MS	0.4	tc w/ possible testifying plaintiff re recent developments at Kellogg
2/21/2017	MD	0.7	MS/MD/ME/JF Meet re 1. current plaintiffs' termination documents/contract .4; 2. potential new intake process .3
2/21/2017	MS	0.7	MS/MD/ME/JF Meet re 1. current plaintiffs' termination documents/contract .4; 2. potential new intake process .3
2/21/2017	MD	0.3	md/ms discuss strategy re filing of new case(s) and preserving claims given Kellogg's change in practices and severance agreement
2/21/2017	ME	0.7	MS/MD/ME/JF Meet re 1. current plaintiffs' termination documents/contract .4; 2. potential new intake process .3
2/21/2017	MS	0.3	md/ms discuss strategy re filing of new case(s) and preserving claims given Kellogg's change in practices and severance agreement
2/21/2017	MD	0.1	md/ms discuss communication to Boudreau re severance agreement
2/21/2017	ME	0.1	telephone call from intake about joining case
2/21/2017	JF	0.6	Call with a terminated plaintiff
2/21/2017	MS	0.3	tc w/ opt in re rights and risks under new reorganization
2/21/2017	JF	0.1	MD/JF JF to check with MD on the protocol re recently terminated plaintiffs (documentation)
2/21/2017	MS	1.1	draft letter to Boudreau re illegalities of severance agreement
2/21/2017	ME	0.3	tc w/ opt in re rights and risks under new reorganization
2/21/2017	CLER	0.1	Prepare welcome ltr to new client
2/21/2017	AN	0.1	Telephone call from potential client re consent to sue form
2/21/2017	CLER	0.1	create PDF format of CTS recd
2/21/2017	MS	0.5	research on illegal class communications and class communications as retaliation
2/21/2017	MD	0.1	MD/JF JF to check with MD on the protocol re recently terminated plaintiffs (documentation)
2/21/2017	JF	0.2	ME/JF Check-in re recent development in the case (re re-structuring)
2/21/2017	ME	0.3	MS/ME telephone call with opt-in with concerns about company transition and impacts to his claim

Date	Staff	Amount of Time	Description
2/21/2017	MS	0.1	md/ms discuss communication to Boudreau re severance agreement
2/21/2017	ME	0.2	create tracking spreadsheet for intakes .1; enter information into spreadsheet .1
2/21/2017	JF	0.2	Call two claimants to schedule attorney conversations MS/MD/ME/JF Meet re 1. current plaintiffs' termination documents/contract .4; 2.
2/21/2017	JF	0.7	potential new intake process .3
2/21/2017	ME	0.2	ME/JF Check-in re recent development in the case (re re-structuring)
2/21/2017	JF	0.4	Phone call with a plaintiff re re-structuring/potential termination
2/21/2017	ME	0.1	ms/me discuss new opt in call clean up notes from telephone call with opt-in who had concerns about how company
2/21/2017	ME	0.1	transition might impact his claim
2/21/2017	MS	0.1	ms/me discuss new opt in call
2/21/2017	JF	0.2	Format the termination document received from a plaintiff MS/ME telephone call with opt-in with concerns about company transition and impacts
2/21/2017	MS	0.3	to his claim
2/22/2017	MS	0.4	tc w/ second opt-in re effect of severance agreement on claims going forward
2/22/2017	JF	0.1	Brief phone conversation with spouse of plaintiff re re-structuring/potential retaliation
2/22/2017	JF	0.1	Compose email to attorneys re individual meeting re Kellogg re-structuring
2/22/2017	MS	0.3	tc w/ opt-in re effect of severance agreement on claims going forward
2/22/2017	JF	0.2	Compose email to MS and MD re plaintiff concerns about potential retaliation
2/22/2017	JF	0.2	ME/JF Check-in re fielding calls from opt-ins
2/22/2017	JF	0.6	Intake call re effects of re-structuring
2/22/2017	JF	0.1	Call with opt-in re re-structuring/her upcoming individual meeting
2/22/2017	ME	0.2	ME/JF Check-in re fielding calls from opt-ins
2/22/2017	MR	0.3	MR/JF Discuss plaintiff concerns re Kellogg re-structuring
2/22/2017	MS	0.4	finalizing and sending letter to Boudreau re severance agreement
2/22/2017	JF	0.7	Intake conversation with a potential client
2/22/2017	JF	0.3	MR/JF Discuss plaintiff concerns re Kellogg re-structuring
2/22/2017	ME	0.2	ME/JF Check-in re Kellogg re-structuring/retaliation concerns
2/22/2017	JF	0.5	Call with plaintiff re Kellogg re-structuring
2/22/2017	ME	0.3	JF/ME discuss speaking with clients about company transition
2/22/2017	MS	0.3	draft policy for responding to clients re retaliation
2/22/2017	JF	0.2	ME/JF Check-in re Kellogg re-structuring/retaliation concerns
2/22/2017	JF	0.3	JF/ME discuss speaking with clients about company transition
2/22/2017	JF	0.2	Call with opt-in re case update telephone call from opt-in with concerns about how severance might impact claims in
2/22/2017	ME	0.1	this case
2/22/2017	JF	0.5	MS/JF/ME discuss how to speak with intakes about filing a new case and responding to severance questions
2/22/2017	MS	0.5	MS/JF/ME discuss how to speak with intakes about filing a new case and responding to severance questions
2/22/2017	ME	0.1	email opt-in regarding sending documents to our office
2/22/2017	ME	0.5	MS/JF/ME discuss how to speak with intakes about filing a new case and responding to severance questions
2/22/2017	ME	0.2	telephone call with opt-in regarding concern about severance and impacts on claims in this case
2/23/2017	MS	0.1	MS/ME discuss responding to claimant's concerns about claims in this case affecting severance

Date	Staff	Amount of Time	Description
2/23/2017	ME	0.6	type up responses to client and intake questions regarding recent company transition for attorney to review
2/23/2017	MS	0.2	MS/JF Conference call with opt-in re new Kellogg contract and its provisions/impact
2/23/2017	ME	0.1	MS/ME discuss status of communications with opposing counsel about assuring claims in this case will not be impacted by the severance agreement
2/23/2017	JF	0.2	Call with a plaintiff re new contract
2/23/2017	ME	0.1	save opt-in's documents sent to our office
2/23/2017	JF	0.1	Call to opt-in re severance package offer
2/23/2017	MS	0.1	MS/ME discuss status of communications with opposing counsel about assuring claims in this case will not be impacted by the severance agreement
2/23/2017	JF	0.6	Call with plaintiff re severance package
2/23/2017	ME	0.1	telephone call to claimant regarding his concerns about affect of participation in this case on his severance
2/23/2017	JF	2.1	Task to assemble potential trial witness evidence
2/23/2017	ME	0.1	return call to intake about status in case
2/23/2017	JF	0.1	Call to opt-in re new contract offer
2/23/2017	JF	0.2	Respond to/save attached documents from opt-in re new contract
2/23/2017	MS	0.5	draft responses to clients seeking advice on Kellogg severance agreement provisions regarding pending claims
2/23/2017	ME	0.2	update spreadsheet to track clients calling regarding recent company transition
2/23/2017	JF	0.2	Call to opt-in re the case update
2/23/2017	ME	0.1	respond to opt-in's email about company's recent transition
2/23/2017	ME	0.1	update spreadsheet to track intakes calling regarding joining the case
2/23/2017	ME	0.3	ME/JF Check-in re severance agreements/new contracts
2/23/2017	MS	0.3	tc w/ J Boudreau re effect of reorganization employment agreement on Thomas plaintiffs
2/23/2017	ME	0.6	ME/JF Check-in re fielding client calls/questions
2/23/2017	JF	0.3	ME/JF Check-in re severance agreements/new contracts
2/23/2017	JF	0.6	ME/JF Check-in re fielding client calls/questions
2/23/2017	JF	0.2	MS/JF Conference call with opt-in re new Kellogg contract and its provisions/impact
2/23/2017	ME	0.1	MS/ME discuss responding to claimant's concerns about claims in this case affecting severance
2/23/2017	MS	0.3	tc w/ Plaintiff re effect of reorganization employment agreement on Thomas plaintiffs
2/23/2017	ME	0.1	telephone call from opt-in about severance
2/24/2017	JF	0.2	Call from a potential new intake (new Kellogg case)
2/24/2017	ME	0.3	telephone call from opt-in with concerns about how severance might impact claims in this case .2; notes from conversation .1
2/24/2017	ME	0.1	ME/JF Check-in re reception of fax from a potential new plaintiff
2/24/2017	JF	0.2	Call from plaintiff re acceptance of the new contract
2/24/2017	AG	0.1	AG/JF Consult re preparation of Fedex label
2/24/2017	JF	0.1	MS/JF Check-in re plaintiff phone call requested by plaintiff (new contract offer)
2/24/2017	JF	0.1	ME/JF Check-in re reception of fax from a potential new plaintiff
2/24/2017	JF	0.2	ME/JF Check-in re phone calls from plaintiffs (script)
2/24/2017	JF	0.1	AG/JF Consult re preparation of Fedex label
2/24/2017	JF	0.1	Send email out to Kellogg Team re new contract agreement sent by plaintiff
2/24/2017	MS	0.3	conversation with Plaintiff re requirements for severance

Date	Staff	Amount of Time	Description
2/24/2017	MS	0.2	draft email to clients re releases affect on Thomas claims
2/24/2017	ME	0.2	read public information about company layoff
2/24/2017	MS	0.4	review additional severance releases
2/24/2017	MS	0.5	interview w/ Plaintiff re new positon in restructured Snacks Division
2/24/2017	MS	0.3	conversation with Plaintiff re requirements for continued employment
2/24/2017	JF	0.2	Call with plaintiff re signing of a new contract
2/24/2017	MS	0.3	tc w/ J Boudreau re lack of response on releases
2/24/2017	JF	0.3	Call with plaintiff about the legal consequences of signing severance package agreement
2/24/2017	MS	0.2	review Kellogg letter re releases affect on Thomas claims
2/24/2017	MS	0.2	drafting email to J Boudreau re lack of response on releases
2/24/2017	ME	0.3	telephone call from opt-in about severance agreement .2; notes from conversation .1
2/24/2017	CM	0.8	review personnel files for information on potential witnesses
2/24/2017	CLER	0.3	Prepare Fedex label for potential named plaintiff to mail documents to us (Kellogg - new)
2/24/2017	ME	0.2	ME/JF Check-in re phone calls from plaintiffs (script)
2/24/2017	JF	0.4	Call from plaintiff re severance package offer
2/24/2017	JF	0.4	Call with plaintiff about the legal consequences of signing severance package agreement
2/24/2017	CM	0.1	JF/CM review information needed re potential witnesses
2/24/2017	MS	0.1	MS/JF Check-in re plaintiff phone call requested by plaintiff (new contract offer)
2/24/2017	JF	0.1	JF/CM review information needed re potential witnesses
2/27/2017	MS	0.1	tc to opt in re withdrawal request
2/27/2017	JF	0.2	ME/JF Check-in re plaintiff outreach/potential questions
2/27/2017	JF	0.1	MD/JF Status of the deposed plaintiffs review in preparation for the trial
2/27/2017	CM	2.2	review documents to find information needed on possible witnesses
2/27/2017	JF	2.8	Call plaintiffs/update plaintiff trial review chart
2/27/2017	ME	0.2	ME/JF Check-in re plaintiff outreach/potential questions
2/27/2017	ME	0.1	schedule team meeting
2/27/2017	ME	0.1	telephone call from opt-in regarding severance impacts on case
2/27/2017	MD	0.1	MD/JF Status of the deposed plaintiffs review in preparation for the trial
2/27/2017	JF	2.1	Field calls re re-structuring (severance packages, employment contracts)
2/27/2017	ME	0.1	left voicemail for opt-in regarding severance concerns
2/27/2017	CLER	0.1	create PDF format of CTS recd
2/27/2017	CLER	0.1	Data Entry of contact information
2/27/2017	ME	0.1	telephone call to opt-in regarding concerns severance impacts on claims
2/27/2017	MS	1.1	research on state claims for opt-ins
2/27/2017	ME	0.2	telephone call from opt-in for case update .1; notes from conversation .1
2/27/2017	ME	0.1	telephone call from opt-in to schedule time to speak about information for trial
2/27/2017	JF	0.1	MD/JF Question about the disclosure of Thomas litigation for the purposes of acceptance of severance package
2/27/2017	ME	0.2	telephone call to opt-in regarding concerns about severance impacting claims in this case .1; notes from conversation .1
2/27/2017	JF	1.9	Calls to opt-ins re the effects of Thomas litigation on their severance packages/new contract offers
2/27/2017	MD	0.1	MD/JF Question about the disclosure of Thomas litigation for the purposes of acceptance of severance package

Date	Staff	Amount of Time	Description
2/28/2017	MS	0.5	legal research on FWW in 9th Cir and WD WA
2/28/2017	JF	0.1	MS/JF Check-in re location of Kellogg plaintiff list by state
2/28/2017	JF	0.1	Leave VM/email plaintiff re severance package offer
2/28/2017	JF	0.1	MS/JF Review documents sent to us by potential named plaintiff
2/28/2017	ME	0.2	ME/JF Check-in re case status (phone calls re severance package/new contract offers)
2/28/2017	CM	0.1	JF/CM check in about response to email inquiries from opt-ins
2/28/2017	MR	0.1	JF/MR discuss need for age column to be added to opt-in chart
2/28/2017	ME	0.1	email opt-in regarding concerns about remaining in the case impacting his severance
2/28/2017	JF	0.1	JF/MR discuss need for age column to be added to opt-in chart
2/28/2017	JF	1.2	Field phone inquiries re restructuring
2/28/2017	MS	0.1	MS/JF Review documents sent to us by potential named plaintiff
2/28/2017	MR	0.2	work to add age column to para JF's chart of opt-in information
2/28/2017	JF	1.8	Call/update potential trial witness chart
2/28/2017	JF	0.1	JF/CM check in about response to email inquiries from opt-ins
2/28/2017	ME	0.3	telephone call from opt-in regarding concerns about remaining in the case impacting his severance .2; notes from conversation .1
2/28/2017	MD	0.2	md/ms discussing process to protect state claims given Kellogg's objections
2/28/2017	MS	2.2	legal research on joining state law claims for opt ins
2/28/2017	JF	0.2	ME/JF Check-in re case status (phone calls re severance package/new contract offers)
2/28/2017	ME	0.1	telephone call with opt-in to gather information for trial
2/28/2017	MR	0.2	locate chart of plaintiffs and states worked .1, send chart to atty MS .1
2/28/2017	MS	0.4	several emails to Boudreau re Kellogg's position on effect of release on Opt-ins
2/28/2017	JF	0.2	Update/review potential trial witness chart
2/28/2017	MS	1.3	legal research on pendant state law claims to FLSA collective
2/28/2017	MS	0.1	MS/JF Check-in re location of Kellogg plaintiff list by state
2/28/2017	MS	0.2	md/ms discuss process to protect state claims given Kellogg's objections
2/28/2017	MS	0.4	tc w/ opt-in seeking to withdraw due to Kellogg severance agreement
2/28/2017	AN	0.1	Telephone call from plaintiff with question
3/1/2017	MR	0.3	briefly examine new payroll and personnel data from Defendant
3/1/2017	MR	0.2	MS/MR confer about new payroll and personnel data from Kellogg
3/1/2017	MD	2	review evidence for selecting representative witnesses to testify
3/1/2017	JF	0.1	MD/JF Discuss the project to update deposed plaintiff chart with additional information
3/1/2017	MS	0.2	review and revise update letter to RSRs
3/1/2017	MS	0.2	MS/MR confer about new payroll and personnel data from Kellogg
3/1/2017	JF	0.3	Call from Kellogg plaintiff re severance package acceptance
3/1/2017	JF	0.1	MD/JF Check-in re Kellogg tasks
3/1/2017	ME	0.1	email JF about reviewing process for downloading defendants' discovery responses
3/1/2017	MS	0.1	md/ms discuss briefing responsibility for raising state claims 0.1
3/1/2017	MD	0.1	MD/JF Check-in re Kellogg tasks
3/1/2017	MD	0.1	MD/JF Discuss the project to update deposed plaintiff chart with additional information
3/1/2017	MD	0.1	md/ms discuss briefing responsibility for raising state claims 0.1
3/1/2017	MS	0.8	research into joinder principles as applied to FLSA claims
3/1/2017	MS	0.5	research into amendment under FRCP 1 post sj
3/1/2017	MS	0.5	research into claim preclusion

Date	Staff	Amount of Time	Description
3/1/2017	JS	0.3	Plt returned call from JF re: Territory designation question
3/1/2017	MR	0.7	combine all new payroll data files produced by Defendant .5, add source column to combined data excel sheet .2
3/2/2017	JF	1.1	MD/MS/JF/ME review Kellogg's exit from DSD .3; possibility for beginning new case .3; identifying needed discovery .2; status of trial plan .3
3/2/2017	MS	0.6	research on claim preclusion
3/2/2017	MS	1.7	draft outline for motion to amend
3/2/2017	MS	0.7	legal research on FRCP 15 amendment standard in WDVA
3/2/2017	MD	1.1	MD/MS/JF/ME review Kellogg's exit from DSD .3; possibility for beginning new case .3; identifying needed discovery .2; status of trial plan .3
3/2/2017	MS	1.1	MD/MS/JF/ME review Kellogg's exit from DSD .3; possibility for beginning new case .3; identifying needed discovery .2; status of trial plan .3
3/2/2017	ME	1.1	MD/MS/JF/ME review Kellogg's exit from DSD .3; possibility for beginning new case .3; identifying needed discovery .2; status of trial plan .3
3/2/2017	ME	0.1	telephone call from opt-in about severance concerns
3/2/2017	MD	4.5	review client information for selection of trial witnesses
3/2/2017	MS	0.3	draft posting for new case on website
3/2/2017	MS	0.2	draft web posting language for new case
3/2/2017	MS	0.1	draft agenda for team meeting
3/2/2017	JF	0.1	Update deposed plaintiff chart
3/2/2017	CLER	0.1	create PDF format of correspondence recd from D. (CD containing KELLOGG-331418-331423, update employment action history of opt-in P., pay history data)
3/2/2017	ME	0.2	JF/ME review data to determine states opt-ins worked in
3/2/2017	JF	0.2	JF/ME review data to determine states opt-ins worked in
3/3/2017	ME	0.4	prepare letters to return late consents to sue .3; verify that all have been prepared
3/3/2017	ME	0.2	draft letter to return consents to sue to people who have previously been contacted, but have not had their CTS returned
3/3/2017	ME	0.1	telephone call from opt-in for case update
3/3/2017	ME	0.1	email team about updating website
3/3/2017	ME	0.3	post update about investigating new case to website
3/3/2017	ME	0.2	email MD information for identifying witnesses for trial
3/3/2017	ME	0.2	telephone call from opt-in for case update
3/3/2017	ME	0.1	send opt-in email with link to case updates
3/3/2017	ME	0.2	update letterhead on letters to return consents to sue to reflect new firm name
3/3/2017	ME	0.4	create consent to sue return letters for people who have previously sent consents to sue
3/3/2017	MS	0.2	draft revised CTS link
3/6/2017	MD	3.5	reviewing witness testimony and documents for witness selection 3.5
3/6/2017	ME	0.4	ME/JF Meet re hire and term dates for the potential trial witness chart
3/6/2017	JF	0.4	ME/JF Meet re hire and term dates for the potential trial witness chart
3/6/2017	JF	2.1	Update the plaintiff/potential trial witness chart with dates of employment
3/6/2017	MS	0.1	email documentation of Kellogg severance agreement waiver
3/6/2017	MS	0.6	tc w/ client re Kellogg severance agreement waiver
3/6/2017	JF	0.2	JF/ME review status of identifying potential witnesses for trial and delegate tasks still needed to be completed
3/6/2017	ME	0.2	JF/ME review status of identifying potential witnesses for trial and delegate tasks still needed to be completed
3/6/2017	MS	0.1	MS/JF Meet re outreach plan (new case)



Date	Staff	Amount of Time	Description
3/6/2017	JF	0.1	MS/JF Meet re outreach plan (new case)
3/7/2017	JF	1.8	Update deposited plaintiff/potential trial witness chart
3/7/2017	MS	0.5	tc w/ Opt-in plaintiff re Kellogg severance agreement requirement to withdraw claims
3/7/2017	ME	0.1	telephone call with opt-in for case update
3/7/2017	ME	0.3	send email to JF to verify intakes who need to have their CTS returned
3/7/2017	MS	1.4	draft motion for collective treatment of opt-in claims, FRCP 15 section
3/7/2017	ME	0.2	MR/ME discuss project for identifying hire and term dates of potential witnesses
3/7/2017	JF	0.2	MR/ME/JF Conference call re inclusion or exclusion of the Kellogg Merchandiser position
3/7/2017	JF	0.2	MR/JF Meet to discuss terms dates of the deposited plaintiffs to gather evidence for trial witness chart
3/7/2017	MR	3.6	Identify opt-ins who work for Kellogg in two years since last job history data 3.0, Isolate new job titles from Kellogg Mar 2017 history data .5, email to team about two new job designations .1
3/7/2017	MR	0.2	MR/ME/JF Conference call re inclusion or exclusion of the Kellogg Merchandiser position
3/7/2017	ME	0.2	MR/ME/JF Conference call re inclusion or exclusion of the Kellogg Merchandiser position
3/7/2017	ME	0.2	ME/JF Check-in re the process to update plaintiff/potential trial witness chart (start and term dates)
3/7/2017	MR	0.2	read and reply to email thread about new job title .2
3/7/2017	MR	0.2	MR/JF Meet to discuss terms dates of the deposited plaintiffs to gather evidence for trial witness chart
3/7/2017	JF	0.2	ME/JF Check-in re the process to update plaintiff/potential trial witness chart (start and term dates)
3/7/2017	ME	0.3	search for evidence of Kellogg Merchandiser position being an hourly position
3/7/2017	ME	0.1	telephone call from opt-in concerned about severance impacting claims in this case
3/7/2017	ME	0.1	send email to claimant concerned about severance impacting claims in this case
3/7/2017	MR	0.1	MD/MR discuss covered/non-covered status of new job title
3/7/2017	MR	0.2	MR/ME discuss project for identifying hire and term dates of potential witnesses
3/7/2017	MS	0.1	MD/MR discuss covered/non-covered status of new job title
3/7/2017	MD	3.5	reviewing client documents for selection of trial witnesses 3.5
3/7/2017	MS	1.2	drafting motion for collective treatment of opt-in claims, joinder section
3/8/2017	MD	0.1	MD/ME review opt-in's discovery document for trial preparation
3/8/2017	ME	0.1	MD/ME review opt-in's discovery document for trial preparation
3/8/2017	JF	0.9	Update the deposited plaintiff/potential trial witness chart
3/8/2017	MR	0.2	MR/JF Check-in re deposited plaintiff re-classification
3/8/2017	MD	5.5	review plaintiffs documents to select trial witnesses 5.5
3/8/2017	JF	0.2	MR/JF Check-in re deposited plaintiff re-classification
3/8/2017	MR	0.1	Read and reply to email exchange with para JF about Sales Rep position
3/8/2017	MR	6.4	Work on duplicate row issues with Kellogg payroll data 2.8; work on combined payroll datasets for damages 2.2; review extrapolations in relation to older payroll data 1.0
3/8/2017	MR	1	Isolate emp ids and division that have additional weeks to include in damages
3/8/2017	MD	0.2	MD/ME discuss updating consent to sue link on website

Date	Staff	Amount of Time	Description
3/8/2017	ME	0.2	MD/ME discuss updating consent to sue link on website
3/8/2017	JF	1.8	Review PLT files for documents related to hours worked/documented
3/9/2017	JF	2.3	Review PLT files for documents that document hours worked
3/9/2017	MD	1.5	review plaintiffs' documents for selection of witnesses
3/9/2017	MS	0.2	draft email re motion for state law claims
3/9/2017	JF	0.3	Phone conversation with PLT re severance agreement
3/9/2017	JF	0.1	Follow up with a plaintiff re severance package via email
3/9/2017	JF	0.1	MD/JF Discuss the task to review PLT documents in preparation for the trial (hours worked documents)
3/9/2017	ME	0.2	telephone call from intake about late CTS .1; notes from conversation .1
3/9/2017	ME	0.2	telephone call to intake about late CTS .1; notes from conversation .1
3/9/2017	MD	0.1	MD/JF Discuss the task to review PLT documents in preparation for the trial (hours worked documents)
3/9/2017	MR	4.8	revamp analysis of which rows of 2017 payroll data needed for damage calcs 3.0, what data of previously omitted opt-ins to include in damage calcs per new history data .6, what data is in available in 2017 payroll data .4, what data is in earlier payroll data .4, what data of those previously omitted opt-ins is missing and needs extrapolations .4
3/9/2017	MS	0.3	tc w/ opt in re Kellogg demand for amended bankruptcy statements
3/9/2017	MS	0.2	circulate and send motion for state law claims
3/9/2017	MS	0.1	tc to Brkptcy lawyer re clients claim for amendment
3/9/2017	MR	6.1	Extensive documentation of work done on new calculations 3.2; Add state info .8; Add check columns .7; Examine and troubleshoot issues .7; Consider options to correct errors .7
3/10/2017	ME	0.2	track the mailing of letters returning late CTS
3/10/2017	ME	0.1	telephone call from opt-in for case update
3/10/2017	ME	0.3	update tracking spreadsheet with list of intakes to contact if new case is filed
3/11/2017	MR	1.6	Continue to analyze payroll for anomalies .2, Identify 5 types of duplicate rows .9, Reconcile number of duplicates of each type with total duplicate row count .5
3/12/2017	MR	1.4	locate and examine old work files that established date formatting for Kellogg pay periods 1.2, confirm that omitted opt-ins are in earliest payroll production (2014) but not included in second production of payroll (10-9-2015) .2
3/13/2017	MD	0.2	md/ms discuss ms negotiations with J. Boudreau re state law claims and whether relationback applies 0.2
3/13/2017	JF	0.1	MR/JF Check-in re linkage of documents in Excel
3/13/2017	MS	0.4	research re relation back on pendant state law claims
3/13/2017	MS	0.2	md/ms discuss ms negotiations with J. Boudreau re state law claims and whether relationback applies
3/13/2017	MD	0.1	md/ms discuss ms call with JB, including potential mediators for settlement discussions
3/13/2017	MR	0.1	MR/JF Check-in re linkage of documents in Excel
3/13/2017	MD	0.1	MD/JF Check-in re PLT document review re hours worked/recorded
3/13/2017	MS	0.5	mediator research
3/13/2017	MR	2.3	Explore approaches to measure effects of state claims using different SOL periods
3/13/2017	JF	0.1	MD/JF Check-in re PLT document review re hours worked/recorded
3/13/2017	MS	0.1	md/ms discuss ms call with JB, including potential mediators for settlement discussions
3/13/2017	MS	0.3	tc w/ J Boudreau re consent to state law claims and mediation

Date	Staff	Amount of Time	Description
3/13/2017	MD	5	reviewing plaintiffs discovery production for witness selection 5.0
3/13/2017	MS	0.2	respond to Boudreau email re SOLs for state law claims
3/13/2017	MR	0.2	ms/mr discuss damages for shortened SOL period
3/13/2017	MR	0.4	ms/mr discuss evaluating effect of SOLs on state law claims for response to Kellogg re motion for joinder
3/13/2017	MS	0.4	ms/mr discuss evaluating effect of SOLs on state law claims for response to Kellogg re motion for joinder
3/13/2017	MS	0.2	ms/mr discuss damages for shortened SOL period
3/13/2017	JF	0.1	Call re acceptance of the severance package
3/13/2017	MS	0.6	research on tolling for state law claims
3/13/2017	MD	0.2	md/ms strategizing re mediation/settlement discussions with Kellogg 0.2
3/13/2017	MS	0.2	md/ms strategizing re mediation/settlement discussions with Kellogg 0.2
3/13/2017	JF	0.1	Call from plaintiff re territory designation
3/14/2017	MR	2.5	Continue work on older payroll data for reps previously omitted from damages (only in extrapolations)
3/15/2017	MR	0.4	mgt conference re paralegal support for Kellogg case
3/15/2017	MD	0.4	mgt conference re paralegal support for Kellogg case
3/15/2017	DG	0.4	mgt conference re paralegal support for Kellogg case
3/15/2017	JF	0.1	Respond to Kellogg plaintiff
3/15/2017	CM	0.4	mgt conference re paralegal support for Kellogg case
3/15/2017	MS	0.4	mgt conference re paralegal support for Kellogg case
3/15/2017	ME	0.1	MD/ME determine location of defendant discovery helpful for selecting trial witnesses
3/15/2017	MD	0.1	md/ms confer re assignment of new paralegal to case with loss of lead paralegal 0.1
3/15/2017	MD	0.1	MD/ME determine location of defendant discovery helpful for selecting trial witnesses
3/15/2017	MS	0.1	md/ms confer re assignment of new paralegal to case with loss of lead paralegal 0.1
3/15/2017	ME	0.1	MD/ME review clients potential as witness for trial
3/15/2017	MD	0.1	MD/ME review clients potential as witness for trial
3/15/2017	MD	2.5	review data and witness information for selection of trial witnesses 2.5
3/15/2017	JF	1.1	Finish the project to review client documents for hours worked documentation
3/16/2017	MD	0.2	MD/AR Develop strategy to research issues in preparation for trial .2
3/16/2017	ME	0.1	left voicemail for intake
3/16/2017	MS	0.4	ms/md/js discuss strategy for paralegal support for trial prep
3/16/2017	JS	0.4	ms/md/js discuss strategy for paralegal support for trial prep
3/16/2017	MD	0.4	ms/md/js discuss strategy for paralegal support for trial prep
3/16/2017	MD	3	reviewing client discovery for trial witness selection 3.0
3/17/2017	JF	0.1	MS/CM/JF Meet re re-distribution of responsibilities post-first paralegal departure
3/17/2017	MD	4	reviewing client deposition testimony and documents for witnesses selection 4.0
3/17/2017	ME	0.3	begin preparing outline of opt-in discovery to help with transition of new paralegal to case
3/17/2017	ME	0.5	reorganize client folder containing consent to sue information to pass information to next paralegal on case .4; organize hard copies of late CTS
3/17/2017	MS	0.1	MS/CM/JF Meet re re-distribution of responsibilities post-first paralegal departure

Date	Staff	Amount of Time	Description
3/17/2017	CM	0.1	MS/CM/JF Meet re re-distribution of responsibilities post-first paralegal departure
3/17/2017	ME	0.2	prepare letter to mail to intake returning late consent to sue
3/20/2017	JF	1.2	Put together the list of hours worked for plaintiff
3/20/2017	MD	5	reviewing witness notes, documents, and data for trial witness selection
3/20/2017	MS	0.2	review new FWW Cir Court case
3/20/2017	JS	0.3	JS/JF Meet re paralegal responsibilities overview
3/20/2017	JS	0.6	MD/ME/JS/JF Meet to discuss the logistics of paralegal responsibilities transfer
3/20/2017	MD	0.6	MD/ME/JS/JF Meet to discuss the logistics of paralegal responsibilities transfer
3/20/2017	ME	1.1	begin paralegal information sheet to provide to paralegal transition onto case
			MD/JF 1. Discuss client outreach in specific jurisdictions (potential new Kellogg case) .1; 2.
3/20/2017	MD	0.2	Discuss paralegal participation in the trial .1
3/20/2017	JF	0.6	MD/ME/JS/JF Meet to discuss the logistics of paralegal responsibilities transfer
			MD/JF 1. Discuss client outreach in specific jurisdictions (potential new Kellogg case) .1; 2.
3/20/2017	JF	0.2	Discuss paralegal participation in the trial .1
3/20/2017	MS	0.1	respond to Boudreau email re timing on consent to motion to amend
3/20/2017	JF	0.4	Calls with Kellogg plaintiffs re severance package acceptance
3/20/2017	JF	0.3	JS/JF Meet re paralegal responsibilities overview
3/20/2017	ME	0.6	MD/ME/JS/JF Meet to discuss the logistics of paralegal responsibilities transfer
			Compose an email to MD re potential intake interviews/reviews (2017 post-restructure
3/21/2017	JF	0.3	interest)
3/21/2017	ME	0.1	Add information to paralegal case transition sheet for JS to take over as lead paralegal
3/21/2017	MS	2.6	drafting motion to include Opt In State Law Claims in the Collective--Fairness Section
			Read the essential docket filings (Complaint, Answer to Complaint, Collective Action
3/21/2017	JF	1.4	Motion) to prepare for the paralegal transition case meeting
3/21/2017	JF	0.7	Transcribe hours worked/recorded by plaintiff (preparation for trial)
3/21/2017	MD	3	reviewing and ranking potential trial witnesses 3.0
			work on identifying information about potential plaintiff witnesses to assist attorneys
3/21/2017	ME	2.1	with trial preparation
3/21/2017	MD	3.5	outlining facts for trial, including identifying facts and witnesses for facts 3.5
3/21/2017	JF	0.1	ME/JF Discuss arrangements re paralegal transition training/meeting
			drafting motion to include Opt In State Law Claims in the Collective--Collective Trial
3/21/2017	MS	0.9	Section, including legal research
3/21/2017	ME	2.9	complete paralegal information sheet to provide to paralegal transition onto case
3/21/2017	JF	0.4	Compose a description of an ideal named plaintiff (paralegal transition/training)
			drafting motion to include Opt In State Law Claims in the Collective--FRCP 18 section,
3/21/2017	MS	2.5	including legal research
			MD/ME determine further review of plaintiffs needed to narrow list of potential
3/21/2017	ME	0.1	witnesses for trial
3/21/2017	MS	1.1	drafting motion to include Opt In State Law Claims in the Collective--Procedural Section
3/21/2017	ME	0.1	ME/JF Discuss arrangements re paralegal transition training/meeting
3/21/2017	JS	1.3	Review PLT SJ motion
			investigate and email claims estimate to client's Bankruptcy counsel to challenge
3/22/2017	MS	0.2	Kellogg's efforts to have her excluded from the case

Date	Staff	Amount of Time	Description
3/22/2017	ME	0.9	ME/JF/JS meet to discuss status of case, current projects, file structure, in order to transition ME off case and JS on.
3/22/2017	JS	1.8	Review DEF PSJ motion; Court order on SJ mots.
3/22/2017	JF	0.9	ME/JF/JS meet to discuss status of case, current projects, file structure, in order to transition ME off case and JS on.
3/22/2017	ME	0.9	search for a defendants' discovery for a document requested by attorney for trial purposes
3/22/2017	ME	1.2	review information that would be useful for identifying potential plaintiff witnesses for trial
3/22/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#216 - Third AMENDED COMPLAINT)
3/22/2017	ME	0.2	update paralegal transition information sheet with information provided by JF
3/22/2017	MD	0.2	debate arguments to make for motion to litigate state claims on collective basis 0.2
3/22/2017	JF	1.2	Locate/email a specific document from the Kellogg MGMT email production (for attorney review)
3/22/2017	ME	0.1	email MD about additional information needed for identifying potential plaintiff witnesses for trial
3/22/2017	ME	0.4	work on identifying information about potential plaintiff witnesses to assist attorneys with trial preparation
3/22/2017	ME	0.3	prepare new letter returning consent to sue for intake whose first letter came back with a forwarding address
3/22/2017	ME	0.1	MD/ME determine additional information needed to identify plaintiff witnesses for trial
3/22/2017	JF	0.2	Transcribe hours worked/recorded by plaintiff (preparation for trial)
3/22/2017	JS	0.9	ME/JF/JS meet to discuss status of case, current projects, file structure, in order to transition ME off case and JS on.
3/22/2017	MD	0.1	MD/ME determine additional information needed to identify plaintiff witnesses for trial
3/22/2017	MS	0.4	tc w/ Bankruptcy counsel re opening her prior bankruptcy case to challenge Kellogg's efforts to have her excluded from the case
3/22/2017	MD	4	outlining proof items (facts/exhibits/witnesses) for liability 4.0
3/22/2017	ME	0.1	email paralegal transition information sheet to JS and JF
3/22/2017	MS	0.2	debate arguments to make for motion to litigate state claims on collective basis 0.2
3/22/2017	ME	0.8	work on identifying information about potential plaintiff witnesses to assist attorneys with trial preparation
3/22/2017	JF	1.8	Convert the PDF version of Defendants' Statement of Facts (Summary Judgment) into MS Word format (for attorney review)
3/22/2017	MS	0.4	Compare Kellogg KVAT plan description to Bain and Willard Bishop descriptions of duties
3/23/2017	JF	0.2	JF/ME format table of authorities/table of contents for Plaintiffs' motion to join state law claims
3/23/2017	ME	0.6	work on identifying information about potential plaintiff witnesses to assist attorneys with trial preparation
3/23/2017	MS	0.7	legal research into distinction of state law claims from FLSA for joinder motion
3/23/2017	ME	0.6	work on deposition digest of claimant's deposition testimony about logs and hours to assist attorneys with trial preparation
3/23/2017	MS	0.5	incorporating ET comments into motion for joinder
3/23/2017	JS	0.1	MD/JS confer regarding JS' status w/r/t reviewing case materials.

Date	Staff	Amount of Time	Description
3/23/2017	MS	0.2	tc w/ client Bankruptcy lawyer re addressing Kellogg demand
3/23/2017	AD	0.1	Look up state MW/OT law research chart for MS .1
3/23/2017	MS	0.2	confer re email to clients about newly laid off KSR/TMs md/ms
3/23/2017	MS	0.1	email to client Bankruptcy lawyer re addressing Kellogg demand
3/23/2017	MS	0.8	finalize motion for joinder
3/23/2017	JF	0.1	Locate email for MS re opt-in representation from 7th and 9th circuits
3/23/2017	JF	0.1	Send Kellogg team email with ToA/ToC formatting update (Motion to Join State Law Claims draft)
3/23/2017	MD	0.1	MD/JS confer regarding JS' status w/r/t reviewing case materials.
3/23/2017	JF	2.5	Perform ToC/ToA formatting of draft of Motion to Join State Law Claims work on identifying information about potential plaintiff witnesses to assist attorneys with trial preparation
3/23/2017	ME	3.1	JF/ME format table of authorities/table of contents for Plaintiffs' motion to join state law
3/23/2017	ME	0.2	claims
3/23/2017	JS	2.2	Review Thomas Deposition in preparation for case management transition
3/23/2017	MD	0.2	confer re email to clients about newly laid off KSR/TMs md/ms
3/23/2017	ME	0.1	telephone call from intake
3/23/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#429 NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Motion Hearing held on 11.21.2016)
3/24/2017	ME	0.2	JF/ME review formatting of the table of authorities for Plaintiffs' motion to join state law
3/24/2017	JF	0.2	claims
3/24/2017	JF	0.2	JF/ME review formatting of the table of authorities for Plaintiffs' motion to join state law
3/24/2017	JF	0.3	MD/JF Review final draft of Table of Authorities to prepare to file Motion to Join State Law Claims
3/24/2017	JF	2.4	Perform ToC/ToA formatting of draft of Motion to Join State Law Claims
3/24/2017	CM	0.1	CM/JF CM to assist JF with page format to prepare to file Motion to Join State Law Claims
3/24/2017	JS	1.6	Review Daugherty Depo Tx in preparation for case management transition
3/24/2017	MD	0.3	MD/JF Review final draft of Table of Authorities to prepare to file Motion to Join State Law Claims
3/24/2017	JF	0.1	CM/JF CM to assist JF with page format to prepare to file Motion to Join State Law Claims
3/27/2017	ME	0.2	MR/JF/JS/ME troubleshoot issue with computer needed for paralegal transition meeting
3/27/2017	JS	0.1	MD/JF/JS/ME discuss status of plaintiffs' witness list for trial
3/27/2017	MD	0.1	MD/JF/JS/ME discuss status of plaintiffs' witness list for trial
3/27/2017	JF	0.1	MD/JF/JS/ME discuss status of plaintiffs' witness list for trial
3/27/2017	JS	0.2	MR/JF/JS/ME troubleshoot issue with computer needed for paralegal transition meeting
3/27/2017	JF	0.2	MR/JF/JS/ME troubleshoot issue with computer needed for paralegal transition meeting
3/27/2017	MR	0.2	MR/JF/JS/ME troubleshoot issue with computer needed for paralegal transition meeting
3/27/2017	MD	0.1	MD/JF Check-in re timeframe for MD's trial witness report during Kellogg paralegal transition meeting
3/27/2017	JF	1.8	Send emails to opt-ins from the 7th and 9th circuits
3/27/2017	JS	0.6	JF/JS/ME review case files, including tracking spreadsheets, to assist with the transition of JS to the case



Date	Staff	Amount of Time	Description
			JF/JS/ME review case files, including tracking spreadsheets, to assist with the transition of
3/27/2017	JF	0.6	JS to the case
3/27/2017	ME	0.1	MD/JF/JS/ME discuss status of plaintiffs' witness list for trial
3/27/2017	JF	0.1	Respond to Kellogg email inquiry
3/27/2017	JF	0.1	Call plaintiff re his email inquiry
			MD/JF Check-in re timeframe for MD's trial witness report during Kellogg paralegal
3/27/2017	JF	0.1	transition meeting
			JF/JS/ME review case files, including tracking spreadsheets, to assist with the transition of
3/27/2017	ME	0.6	JS to the case
			MD/ME explain information on tracking spreadsheet about plaintiffs' who are potential
3/28/2017	MD	0.1	witnesses for trial
3/28/2017	MS	0.3	incorporate Subit comments on motion to join state law claims
3/28/2017	JF	0.3	Edit the final version of the draft of Motion to Join Opt-IN State Law claims
3/28/2017	MS	0.1	email to JK with final formatting instructions
3/28/2017	MS	0.5	final edits on motion to join state law claims
			MA/JF Question re page number format in the footer of PLT Motion to Join Opt-IN State
3/28/2017	JF	0.1	Law Claims (brief formatting for atty review)
3/28/2017	JF	0.4	Revise/edit the potential witness interview questionnaire
			MD/ME explain information on tracking spreadsheet about plaintiffs' who are potential
3/28/2017	ME	0.1	witnesses for trial
3/28/2017	JF	0.1	Send email to MS re edits to PLT draft of Motion to Join Opt-IN State Law Claims
3/28/2017	MD	0.1	MD/JF Check-in re potential witness outreach status (preparation for the trial)
3/28/2017	ME	1.1	identify information about potential plaintiff witnesses for trial
3/28/2017	JF	0.1	Respond to email query from Kellogg plaintiff
3/28/2017	JF	0.1	MD/JF Check-in re potential witness outreach status (preparation for the trial)
3/28/2017	AG	0.2	AG/JF ECF Filing of P. MOTION to Join Opt-Ins State Law Claims for Collective Treatment
3/28/2017	JF	0.2	AG/JF ECF Filing of P. MOTION to Join Opt-Ins State Law Claims for Collective Treatment
3/28/2017	MD	3	edit interview form for trial witness interview 3.0
			Transfer documents recd from ECF system to docket file and create file copy (Docket#430
3/28/2017	CLER	0.1	- MOTION to Join Opt-Ins State Law Claims for Collective Treatment)
			MD/JF Brief meeting re previously drafted plaintiff questionnaires in preparation for the
3/28/2017	MD	0.1	potential trial witness outreach
3/28/2017	JF	0.1	Respond to email query from Kellogg plaintiff
3/28/2017	JF	1.2	Perform DT search re potential Named Plaintiff's records (Mitchell, Marla)
3/28/2017	JF	0.3	Review case folder for opt-in questionnaire (for attorney review)
			MD/JF Brief meeting re previously drafted plaintiff questionnaires in preparation for the
3/28/2017	JF	0.1	potential trial witness outreach
			MA/JF Question re page number format in the footer of PLT Motion to Join Opt-IN State
3/28/2017	MA	0.1	Law Claims (brief formatting for atty review)
3/29/2017	JF	0.1	Send email to MD re intake documents
			develop strategy for presenting witness testimony, including conduct witness interview
3/29/2017	MS	1.3	for witness testimony at trial
3/29/2017	MD	0.4	draft email to named plaintiffs, deponents, and opt-ins re testimony at trial 0.4
3/29/2017	JS	0.2	Review drafts of emails to clients re: trial
			develop strategy for presenting witness testimony, including conduct witness interview
3/29/2017	MD	1.3	for witness testimony at trial

Date	Staff	Amount of Time	Description
3/30/2017	JS	0.4	JS/JF Review the logistics/division of responsibilities re witness outreach efforts
			Create spreadsheet for plaintiff tracking purposes as witnesses--distinguish between opt-ins, deposed plts, and named plts; pull TM records to complete contact information,
3/30/2017	JS	1.8	geolocation, etc.
3/30/2017	JS	2.7	Draft 46 emails to opt-ins to notify of trial and confirm availability as witnesses
3/30/2017	JF	0.2	Review/edit email to be sent out to potential trial witnesses
3/30/2017	JF	0.4	JS/JF Review the logistics/division of responsibilities re witness outreach efforts
3/30/2017	JF	0.5	MD/JS/JF Coordinate potential witness outreach efforts in anticipation of the trial
3/30/2017	MD	0.5	MD/JS/JF Coordinate potential witness outreach efforts in anticipation of the trial
3/30/2017	JS	0.5	MD/JS/JF Coordinate potential witness outreach efforts in anticipation of the trial
3/30/2017	JF	0.2	Review "trial" folder for relevant documents
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	ME	0.2	JF/ME review location of hard copies of case documents
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JF	0.3	ME/JF Review the location of hard copies of documents
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	ME	0.3	ME/JF Review the location of hard copies of documents
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation

Date	Staff	Amount of Time	Description
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
3/31/2017	JS	0.1	Draft email to deponents and named plaintiffs regarding trial schedule and next steps for preparation
4/3/2017	MD	0.4	MD/JF Work together to compile documents for a potential trial witness
4/3/2017	MS	0.4	develop strategy re court mandated settlement negotiations and use of trial counsel 0.4
4/3/2017	MD	0.4	develop strategy re court mandated settlement negotiations and use of trial counsel 0.4
4/3/2017	JS	0.6	Process and save email responses regarding witness evaluation and prep calls for responses to Friday email.
4/3/2017	JF	0.1	MD/JF Check-in re schedule of potential trial witnesses
4/3/2017	MD	0.1	respond to email re scheduling witness interviews for trial 0.1
4/3/2017	MD	2.5	edit witness interview outline 2.5
4/3/2017	MD	0.3	read J. Leighton fluctuating workweek decision 0.3
4/3/2017	MD	0.1	MD/JF Check-in re schedule of potential trial witnesses
4/3/2017	JS	0.6	Connect ~80 sent emails to their respective TM entries
4/3/2017	JF	0.4	MD/JF Work together to compile documents for a potential trial witness
4/3/2017	MD	1.5	review document production, including mileage data for client interview for trial witness prep 1.5
4/3/2017	MD	0.2	draft email to client about interview for trial 0.2
4/4/2017	JF	3.1	Assemble documents for client review prior to witness interviews (preparation for trial)
4/4/2017	JF	0.5	MD/JF Discuss assemblage of documents for potential trial witness interviews
4/4/2017	JF	0.6	Compose emails to clients with responsive interview documents attached
4/4/2017	JF	1.6	MD/JF Conduct potential trial witness interview
4/4/2017	MD	0.5	MD/JF Discuss assemblage of documents for potential trial witness interviews
4/4/2017	MD	0.1	MD/JF Check-in re potential trial witness (post-interview re-group)
4/4/2017	JF	0.3	Follow up on opt-in email correspondence
4/4/2017	JF	0.1	MD/JF Check-in re potential trial witness (post-interview re-group)
4/4/2017	MD	1.6	MD/JF Conduct potential trial witness interview
4/4/2017	CM	0.2	assist JF in using sendthisfile to send documents to client
4/4/2017	JF	0.6	Fill in the Interview form with pertinent information prior to trial witness interview
4/4/2017	MD	0.3	prepare for call with potential trial witness 0.3
4/5/2017	JF	0.7	Revise/update the witness interview form

Date	Staff	Amount of Time	Description
4/5/2017	JF	0.1	CM/JF CM to assist JF with Word formatting
4/5/2017	CM	0.1	CM/JF CM to assist JF with Word formatting
4/5/2017	JF	0.1	Reply to plaintiff in the case re his email
4/5/2017	JF	0.1	Call to confirm a witness interview appointment
4/5/2017	JF	0.1	Respond to potential witness plaintiff re delivery of responsive documents
4/5/2017	JF	0.1	Send a calendar invitation to team to participate in witness interviews
4/5/2017	JF	0.2	Compose an update email to the team re witness interview process
4/5/2017	MD	0.1	MD/JF Check-in re para review of client documents prior to witness interviews
4/5/2017	JF	0.1	Call to plaintiff re case update
4/5/2017	MD	0.2	MD/JF Check-in re review of tasks to be accomplished
4/5/2017	MD	0.1	MD/JF Check-in re potential witness/plaintiff's hours worked (pre-interview)
4/5/2017	JF	0.1	MD/JF Check-in re para review of client documents prior to witness interviews
4/5/2017	JF	0.4	Review plaintiff's folder in preparation for the witness interview
4/5/2017	JF	0.1	MD/JF Check-in re potential witness/plaintiff's hours worked (pre-interview)
4/5/2017	JF	0.2	MD/JF Check-in re review of tasks to be accomplished
4/6/2017	JF	0.2	JS/JF Check-in re the process to schedule witness interviews/review of documents
4/6/2017	JS	0.2	JS/JF Check-in re the process to schedule witness interviews/review of documents
			Review/format/prepare/email interview forms in preparation for upcoming potential trial
4/6/2017	JF	3.6	witness interviews
4/6/2017	JS	0.1	Edit scheduled call entry in spreadsheet
4/6/2017	JS	0.1	Review and save response email from plt for scheduling witness evaluation call
4/6/2017	MS	0.1	MS/JF Check-in re the cancellation of witness interview
			Transfer documents recd from ECF system to docket file and create file copy (Docket#431 - PROPOSED ORDER (Unsigned) re [430] MOTION to Join Opt-Ins State Law Claims for
4/6/2017	CLER	0.1	Collective Treatment)
			Review and save email response to scheduling email for trial witness evaluation call
4/6/2017	JS	0.1	scheduling
4/6/2017	JF	0.2	Correspond with a plaintiff via email/call over the phone
4/6/2017	JF	0.1	MS/JF Check-in re the cancellation of witness interview
4/6/2017	JF	0.1	Call to potential trial witness to cancel interview
4/7/2017	JS	0.1	JS/JF Check-in re schedule of interviews
4/7/2017	JF	1.5	MS/JF Conduct potential witness interview
4/7/2017	JS	2.1	Witness evaluation interview
4/7/2017	JF	0.9	Review/update the witness interview schedule for next week
4/7/2017	MS	2.1	Witness evaluation interview
4/7/2017	JS	0.1	MS/JS/JF Review potential witness interview schedule
4/7/2017	MS	0.1	MS/JS/JF Review potential witness interview schedule
4/7/2017	JF	0.1	JS/JF Check-in re schedule of interviews
4/7/2017	JF	0.1	MS/JS/JF Review potential witness interview schedule
4/7/2017	JF	0.3	Assemble plaintiff documents to email to potential trial witness prior to the interview
4/7/2017	JF	0.2	Call with plaintiff re schedule of witness interview
4/7/2017	JF	0.1	Call to plaintiff re-re-schedule of witness interview
4/7/2017	JF	0.1	Email MD re witness documents
4/7/2017	MS	1.5	MS/JF Conduct potential witness interview
4/7/2017	JF	0.4	Assemble documents to mail out to plaintiff prior to witness interview
4/10/2017	JF	0.1	Email MD pre-filled witness interview form and documents

Date	Staff	Amount of Time	Description
			MD/JF Discuss creation of PLT confidentiality agreement to be emailed to potential
4/10/2017	JF	0.1	witnesses
4/10/2017	JF	0.2	Compose/send email to attorneys with my interview feedback
4/10/2017	JF	0.2	Respond to plaintiff re witness interview scheduling
			MD/JF Discuss creation of PLT confidentiality agreement to be emailed to potential
4/10/2017	MD	0.1	witnesses
4/10/2017	JF	0.1	Set up an appt re potential witness interview
4/10/2017	JF	0.5	Prepare PLT interview form (trial preparation)
			Review/email MD feedback re confidentiality Agreement to be emailed to all the
4/10/2017	JF	0.2	potential witnesses
4/10/2017	MD	0.1	MD/JF Check-in re Ron Lynch's documents in preparation for the witness interview
4/10/2017	JF	0.3	Revise/update the potential witness interview performed on Friday, 4/7
4/10/2017	JF	0.1	MD/JF Check-in re Ron Lynch's documents in preparation for the witness interview
4/10/2017	MD	1	MD/JF Conduct witness interview
4/10/2017	JF	1	MD/JF Conduct witness interview
4/10/2017	MD	0.2	MD/JF Check-in re potential plaintiff interview
4/10/2017	JF	0.6	Edit plaintiff potential witness interview form
4/10/2017	JF	0.2	MD/JF Check-in re potential plaintiff interview
4/11/2017	JF	0.1	Email response to potential witness re confidentiality agreement
4/11/2017	JF	0.1	Save a signed copy of confidentiality agreement in witness documents
4/11/2017	JF	0.5	Prepare interview form/documents for potential witness interview
4/11/2017	JF	0.1	Leave voicemail for opt-in re case update
4/11/2017	JF	0.1	Update contact information for opt-in
4/11/2017	JF	0.1	Email opt-in re case update
4/11/2017	JF	0.1	MD/JF Brief check-in re documents to be sent to potential witnesses (trial preparation)
4/11/2017	MD	0.1	MD/JF Brief check-in re documents to be sent to potential witnesses (trial preparation)
4/11/2017	JF	0.1	Archive signed confidentiality agreements
4/11/2017	JF	0.1	Update TM record for potential witness
4/11/2017	JF	0.4	Email confidentiality sheets to potential trial witnesses
4/11/2017	JF	0.1	Review potential witness' 2012 itinerary
4/11/2017	JF	0.3	Review documents of a potential witness (pre-interview)
4/11/2017	JF	0.2	Review potential witness' hours worked (trial review/prep)
4/12/2017	JF	1.2	Edit/update witness interview form with relevant client information
4/12/2017	JF	0.1	Email opt-in in Kellogg to confirm his contact information
4/12/2017	JF	1	MD/JF Conduct potential witness interview
			MD/JF Check-in re 1. production of opt-in's itinerary; 2. documents to be mailed in
4/12/2017	MD	0.1	anticipation of witness interviews
4/12/2017	MD	1	MD/JF Conduct potential witness interview
			MD/JF Check-in re 1. production of opt-in's itinerary; 2. documents to be mailed in
4/12/2017	JF	0.1	anticipation of witness interviews
4/13/2017	JF	0.2	Respond to Kellogg plaintiff re his arbitration agreement (witness interview)
4/13/2017	JS	0.5	Witness evaluation call
4/13/2017	JF	0.1	Calendar DEF and PLT deadlines according to the latest stipulation
4/13/2017	JF	0.1	MD/JF Post-interview check-in (trial witness interviews)
4/13/2017	MD	0.5	MD/JF Potential witness interview

Date	Staff	Amount of Time	Description
			Transfer documents recd from ECF system to docket file and create file copy (NOTICE of
4/13/2017	CLER	0.1	Docket Text Modification re [432] Order to Re-Note Motion)
4/13/2017	MD	0.5	Witness evaluation call
4/13/2017	JF	0.5	MD/JF Potential witness interview
4/13/2017	JF	0.1	Respond to MD's request to calendar new deadlines
4/13/2017	JF	1.6	Conduct calls to schedule potential plaintiff interviews
4/13/2017	JF	0.2	AG/JF Review the most recent court filing by Kellogg (designation of upcoming deadlines)
4/13/2017	JF	0.1	Leave message for plaintiff to set up witness interview
4/13/2017	AG	0.2	AG/JF Review the most recent court filing by Kellogg (designation of upcoming deadlines)
4/13/2017	JF	0.1	Call plaintiff to set up a witness interview
4/13/2017	MD	0.1	MD/JF Post-interview check-in (trial witness interviews)
4/13/2017	JF	0.5	Prepare witness interview form
4/13/2017	MD	0.1	MD/JF Check-in re 1. witness interview schedule; 2. proper calendaring of deadlines
4/13/2017	JF	0.4	Edit/update notes on witness interview
4/13/2017	JF	0.1	MD/JF Check-in re 1. witness interview schedule; 2. proper calendaring of deadlines
4/14/2017	JS	0.1	Respond to scheduling email
4/14/2017	JS	0.2	update witness evaluation spreadsheet
4/14/2017	JF	0.3	MD/JF Call with plaintiff to clarify potential claim period and statute of limitations
4/14/2017	MD	0.2	MD/JF Check-in re potential claims for plaintiff (VL hours designation and SOL)
4/14/2017	JF	0.2	MD/JF Check-in re potential claims for plaintiff (VL hours designation and SOL)
4/14/2017	MD	0.3	MD/JF Call with plaintiff to clarify potential claim period and statute of limitations
4/14/2017	JF	0.1	Compose an email to potential trial witness
4/14/2017	JF	0.1	Send email to attorneys re client inquiry
4/14/2017	JF	0.2	Search client docs for proof of variable labor hours for the designated/statute of limitations-determined period
4/17/2017	JF	0.9	Review/assemble interview form for witness interview
4/17/2017	JF	0.1	Scan/file the confidentiality agreement (witness documents review)
4/17/2017	MS	0.2	MS/JF Discuss the inclusion of Kellogg time studies in the outgoing emails to potential trial witnesses
4/17/2017	JF	0.2	MS/JS/JF Check-in re outreach to non-responsive deponents
4/17/2017	JF	0.1	Respond to JS emails re plaintiff communication
4/17/2017	JF	0.2	MS/JF Discuss the inclusion of Kellogg time studies in the outgoing emails to potential trial witnesses
4/17/2017	JS	0.6	JS/JF Training re document assembly to be sent out for review to potential opt-in witnesses
4/17/2017	JF	1.2	Review/assemble interview form for witness interview
4/17/2017	MS	0.2	MS/JS/JF Check-in re outreach to non-responsive deponents
4/17/2017	JF	0.6	JS/JF Training re document assembly to be sent out for review to potential opt-in witnesses
4/17/2017	JS	0.2	Phone call to schedule witness evaluation call
4/17/2017	JF	0.2	Call with plaintiff to schedule witness interview
4/17/2017	JS	0.5	Assemble documents to send to plt to review in preparation for witness evaluation interview.
4/17/2017	JS	0.2	MS/JS/JF Check-in re outreach to non-responsive deponents



Date	Staff	Amount of Time	Description
4/18/2017	JF	0.1	Call to plaintiff re interview clarification
4/18/2017	JF	0.7	Put together/distribute witness interview sheet
4/18/2017	MS	0.2	MS/JF Review the outcome of potential witness interview
4/18/2017	MS	0.1	MS/JF Brief phone check-in re hours worked noted in the interview form
4/18/2017	MS	1.8	ms/js witness interview call
4/18/2017	JS	0.3	ms/js meeting re witness interview call
4/18/2017	JS	0.4	Update tracking sheet for witness interviews; add confirmation of whether we assembled and sent documents to them
4/18/2017	JF	0.6	Edit/update interview notes
4/18/2017	JS	1.8	ms/js witness interview call
4/18/2017	MS	0.3	ms/js meeting re witness interview call
4/18/2017	JF	1.8	MS/JF Interview potential trial witness
Transfer documents recd from ECF system to docket file and create file copy (Docket#433			
4/18/2017	CLER	0.1	D. RESPONSE to [430] MOTION to Join Opt-Ins State Law Claims for Collective Treatment)
4/18/2017	MS	1.8	MS/JF Interview potential trial witness
4/18/2017	JF	0.2	MS/JF Review the outcome of potential witness interview
4/18/2017	MS	0.3	review Kellogg opposition to motion to join state law claims
4/18/2017	MS	0.3	prepare for call with potential witness, including reviewing docs, rogs, and interviews
4/18/2017	MS	0.3	prepare for call with potential witness, including reviewing docs, rogs, and interviews
4/18/2017	JF	0.1	MS/JF Brief phone check-in re hours worked noted in the interview form
4/19/2017	JS	0.2	Send email with documents to review in preparation to scheduled witness evaluation call
4/19/2017	JF	0.2	JS/JF Discuss the pro-forma response to opt-in not willing to testify at trial
4/19/2017	JF	0.1	MR/JF Review a shortcut for excel spreadsheet (Trial Witness Status sheet for attorney review)
4/19/2017	JF	0.1	MD/JF Check-in re Witness Interview Status excel spreadsheet
4/19/2017	JS	0.2	Send email scheduling witness evaluation call
4/19/2017	CLER	0.1	PCF client (confirmation of contact information)
4/19/2017	JS	0.4	Call with opt-in to schedule witness evaluation phone call
4/19/2017	JS	0.1	Send email scheduling witness evaluation call
4/19/2017	JS	0.2	JS/JF Discuss the pro-forma response to opt-in not willing to testify at trial
4/19/2017	JS	0.1	Send email scheduling witness evaluation call
4/19/2017	JS	0.1	Send email scheduling witness evaluation call
4/19/2017	MR	0.1	MR/JF Review a shortcut for excel spreadsheet (Trial Witness Status sheet for attorney review)
4/19/2017	JS	0.1	Send email scheduling witness evaluation call
4/19/2017	MS	7.3	drafting Reply ISO Motion to Join State Claims
4/19/2017	JS	0.2	Call to schedule witness evaluation call
4/19/2017	JF	0.1	Call to plaintiff re his phone call inquiry
4/19/2017	JS	0.2	Email response re: reticence to testify at trial
4/19/2017	JF	1.2	Prepare potential witness interview status spreadsheet for attorney review
4/19/2017	JF	0.2	MD/JS/JF Meet re 1. status of witness calls .1; 2. plan to add more potential opt-in witnesses .1
4/19/2017	JF	0.9	MD/JF Witness interview call
4/19/2017	JF	0.2	MD/JF Check-in re witness interview
4/19/2017	MD	0.9	MD/JF Witness interview call

Date	Staff	Amount of Time	Description
4/19/2017	JF	0.1	MD/JF Brief meeting re next steps in selection of opt-ins to interview (preparation for trial)
4/19/2017	JS	0.2	MD/JS/JF Meet re 1. status of witness calls .1; 2. plan to add more potential opt-in witnesses .1
4/19/2017	MD	1.5	JS/MD trial witness evaluation interview call
4/19/2017	MD	0.2	MD/JF Check-in re witness interview
4/19/2017	MD	0.2	MD/JS/JF Meet re 1. status of witness calls .1; 2. plan to add more potential opt-in witnesses .1
4/19/2017	JS	1.5	JS/MD trial witness evaluation interview call
4/19/2017	JS	0.4	format notes for witness evaluation call
4/19/2017	MD	0.1	MD/JF Brief meeting re next steps in selection of opt-ins to interview (preparation for trial)
4/19/2017	MD	0.1	MD/JF Check-in re Witness Interview Status excel spreadsheet
4/19/2017	JS	0.7	Type up and circulate interview call notes for three opt-in interviews
4/19/2017	JF	0.7	Put together/email opt-in documents for para/attorney review prior to witness interview
4/20/2017	JF	0.2	Compose email to Kellogg team re upcoming deadline and management of witness interviews
4/20/2017	JF	0.3	Edit/update witness Interview status spreadsheet with the names of the attorney/paralegal who conducted the interview
4/20/2017	MS	0.3	review and incorporate proof reading corrections
4/20/2017	MR	0.2	MR/JF Perform variable labor calculation for Kellogg opt-in who worked in the RSM capacity in the Snacks division of Kellogg
4/20/2017	MS	0.1	follow up with JF re deponents gone MIA
4/20/2017	JF	0.1	Email MD a PDF copy of the DEF Reply to PLT Motion to join state claims
4/20/2017	MS	0.2	review spreadsheet on potential witnesses and comments to JF re additions
4/20/2017	JF	0.7	Review the list of deponents (responsive vs non-responsive)
4/20/2017	MS	0.1	MS/JF Discuss ways to reach unresponsive deponents
4/20/2017	MS	0.9	filing in missing citations on Reply ISO motion to join state law claims, including additional research
4/20/2017	MS	0.1	MS/JF Check in re 1. status of PLT Reply to DEF Response to PLT Motion to join state law claims; 2. team meeting schedule
4/20/2017	MS	0.4	incorporating ET comments into Reply ISO motion to join state law claims
4/20/2017	JF	0.5	Call with plaintiff re case update
4/20/2017	JF	0.2	MR/JF Perform variable labor calculation for Kellogg opt-in who worked in the RSM capacity in the Snacks division of Kellogg
4/20/2017	JS	1.1	Proof and format Plaintiff's Reply to Defendant's Opposition to PLAINTIFFS' REPLY TO DEFENDANT'S OPPOSITION TO JOIN OPT-IN STATE LAW CLAIMS FOR COLLECTIVE TREATMENT (Dkt. 433)
4/20/2017	JF	0.1	MS/JF Discuss ways to reach unresponsive deponents
4/20/2017	JF	0.5	Edit/update opt-in's interview form
4/20/2017	JF	0.1	Send updated interview form to case team
4/20/2017	JF	0.1	MS/JF Check in re 1. status of PLT Reply to DEF Response to PLT Motion to join state law claims; 2. team meeting schedule
4/21/2017	MS	0.4	MS/JS debrief after witness interview call
4/21/2017	JS	1.5	JS/MS witness evaluation interview
4/21/2017	MS	0.3	final revisions to Reply ISO motion to join and circulate for comment and filing
4/21/2017	MD	1.5	JS/MD interview opt-in to evaluate suitability for trial witness
4/21/2017	MS	1.5	JS/MS witness evaluation interview
4/21/2017	JS	0.4	Pre-fill interview notes template with information from time matters notes

Date	Staff	Amount of Time	Description
4/21/2017	JS	0.3	Email documents for opt-in review prior to witness evaluation interview call
4/21/2017	JS	1.5	JS/MD interview opt-in to evaluate suitability for trial witness
4/21/2017	JS	0.5	JS/MD debrief after witness interview call
4/21/2017	AG	0.2	ECF Filing of REPLY TO RESPONSE to [430] MOTION to Join Opt-Ins State Law Claims for Collective Treatment
4/21/2017	MS	0.2	preparing for witness evaluation interview
4/21/2017	MD	0.5	JS/MD debrief after witness interview call
4/21/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#434 - REPLY TO RESPONSE to [430] MOTION to Join Opt-Ins State Law Claims for Collective Treatment)
4/21/2017	JS	0.4	MS/JS debrief after witness interview call
4/21/2017	MD	1.5	JS/MD interview opt-in to evaluate suitability for trial witness
4/21/2017	JS	0.4	Assemble and send additional documents to opt-in prior to evaluation call
4/21/2017	JS	0.1	Email opt-in to reschedule witness evaluation phone call
4/21/2017	JS	0.1	Update witness evaluation phone call scheduling spreadsheet
4/24/2017	MR	0.2	Phone call with MS regarding payroll data issues 1; Read and reply to email from MS for draft email to go to Def Counsel .1
4/24/2017	MS	0.3	review witness interviews
4/24/2017	JS	1.6	Witness evaluation call
4/24/2017	JS	0.7	Type up interview call notes for atty review
4/24/2017	JS	0.4	Assemble documents to email to putative witness for review prior to evaluation phone call
4/24/2017	JS	0.7	Type up interview call notes for atty review
4/24/2017	JS	1.4	Witness evaluation call
4/24/2017	MR	1	Create sample excerpts of March 2017 payroll data problems for MS to review .5; Check current damages for method of handling bonuses .2; Modify annotations to sample excerpts .2; Email sample excerpts to MS with comments .1
4/24/2017	MS	0.2	MS/MR Discuss mediation timeline .1, examine March 2017 payroll data rec'd from Defendant .1
4/24/2017	MS	0.4	review and revise trial proof chart
4/24/2017	MS	0.2	email to Boudreau re settlement conference details and dates
4/24/2017	JS	0.1	Send docs to opt-in for review prior to call
4/24/2017	MS	0.4	review and revise examples of data issues to query Kellogg
4/24/2017	JS	0.3	Pre-fill interview template
4/24/2017	JS	0.1	Send docs to opt-in for review prior to call
4/24/2017	JS	0.1	Send docs to opt-in for review prior to call
4/24/2017	MS	0.4	tc w/ Boudreau re settlement conference
4/24/2017	JS	0.5	Prefill interview template prior to call to evaluate witness for trial
4/24/2017	JS	0.3	reschedule interview call
4/24/2017	MR	0.2	MS/MR Discuss mediation timeline .1, examine March 2017 payroll data rec'd from Defendant .1
4/24/2017	JS	0.1	update case update spreadsheet
4/24/2017	JS	0.6	Pre-fill witness interview template prior to call to evaluate for trial
4/25/2017	MS	0.8	review and revise trial plan outline for sales sections
4/25/2017	JS	0.7	Type up interview notes to circulate to litigation team for evaluation of trial witness
4/25/2017	MS	0.6	reviewing evidence for support of trial plan
4/25/2017	MS	0.4	review and comment on potential witness interview
4/25/2017	JF	0.2	Disseminate notes re witness interviews

Date	Staff	Amount of Time	Description
4/25/2017	JF	0.2	MD/JF Check-in re plaintiff's responses (post trial witness interview)
4/25/2017	MD	0.2	MD/JF Check-in re plaintiff's responses (post trial witness interview)
4/25/2017	JS	0.6	Assemble and email documents for client review prior to witness evaluation phone call
4/25/2017	JF	1.4	MD/JF Conduct witness interview
4/25/2017	JF	0.2	MD/JF Check-in re status of trial witness interviews
4/25/2017	MS	0.8	digesting Holton depo testimony
4/25/2017	MD	0.2	ms/md discuss potential witness interview
4/25/2017	MS	0.1	follow up questions on potential witness interview
4/25/2017	JS	0.8	Pre-fill interview template prior to phone call with opt-in
4/25/2017	MS	0.2	ms/md discuss potential witness interview
4/25/2017	JS	1.6	Call for witness evaluation
4/25/2017	MD	1.4	MD/JF Conduct witness interview
4/25/2017	JF	1.5	Conduct witness interview
4/25/2017	MD	0.1	MD/JF Check-in re plaintiff's responses (post trial witness interview)
4/25/2017	JF	0.1	MD/JF Check-in re potential trial witness interviews
4/25/2017	JF	0.2	MD/JF Discuss best practices re conduct of potential trial witness interviews
4/25/2017	JF	0.1	MD/JF Check-in re plaintiff's responses (post trial witness interview)
4/25/2017	MD	0.1	MD/JF Check-in re potential trial witness interviews
4/25/2017	MD	0.2	MD/JF Discuss best practices re conduct of potential trial witness interviews
4/25/2017	JF	1.1	Update notes re witness interviews
4/25/2017	MD	0.2	MD/JF Check-in re status of trial witness interviews
4/26/2017	JF	2.5	MS/JF Conduct witness interview
4/26/2017	JS	0.4	Assemble documents to email to opt-in prior to interview
4/26/2017	JF	0.4	MS/JF Conduct a follow up witness interview
4/26/2017	JS	0.4	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JF	0.7	MS/JF De-brief re witness interview process
4/26/2017	MS	2.5	MS/JF Conduct witness interview
4/26/2017	MS	0.7	MS/JF De-brief re witness interview process
4/26/2017	JF	0.1	Reach out to potential trial witness to re-schedule the interview
4/26/2017	JS	0.5	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JF	0.4	Compose an email to team re materials to be sent out to opt-ins in advance of the preliminary interview
4/26/2017	JF	0.9	Prepare witness interview form
4/26/2017	JS	0.2	Draft and send FedEx return label for opt-in shipping of additional documents
4/26/2017	JS	0.4	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JS	0.5	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JS	0.4	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JS	0.4	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JS	0.3	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JS	0.4	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	JS	0.4	Assemble documents for opt-in review prior to witness evaluation phone call
4/26/2017	MS	0.4	MS/JF Conduct a follow up witness interview
4/26/2017	JF	0.2	MS/JF Check-in re the follow up interview outcome
4/26/2017	MS	0.2	MS/JF Check-in re the follow up interview outcome
4/27/2017	JF	0.6	MS/MD/JS/JF Team Meeting re 1. Status of witness interviews/scheduling process; 2. changes to interview template; 3. inclusion of planograms for opt-ins to review; 4. new case/intake status
4/27/2017	JF	0.1	Respond to email inquiry re case update

Date	Staff	Amount of Time	Description
4/27/2017	MS	0.6	MS/JF Meet to discuss 1. outcome/process re opt-in interview .4 2. ways to improve the interview process to hone in on specific aspects more effectively .2
4/27/2017	MS	0.6	MS/MD/JS/JF Team Meeting re 1. Status of witness interviews/scheduling process; 2. changes to interview template; 3. inclusion of planograms for opt-ins to review; 4. new case/intake status
4/27/2017	MD	0.6	MS/MD/JS/JF Team Meeting re 1. Status of witness interviews/scheduling process; 2. changes to interview template; 3. inclusion of planograms for opt-ins to review; 4. new case/intake status
4/27/2017	JS	0.1	Call to schedule trial witness interview call; left vm
4/27/2017	JF	0.1	Distribute team meeting agenda via email to team
4/27/2017	JS	0.6	MS/MD/JS/JF Team Meeting re 1. Status of witness interviews/scheduling process; 2. changes to interview template; 3. inclusion of planograms for opt-ins to review; 4. new case/intake status
4/27/2017	MS	0.4	draft revised interview outline on hours of work
4/27/2017	JF	0.5	Prepare witness interview form
4/27/2017	JF	0.2	Draft team meeting agenda
4/27/2017	JF	0.4	Edit/update notes re witness interview
4/27/2017	JF	0.7	Prepare interview form to conduct opt-in interview
4/27/2017	MS	0.2	MS/JF Meet to prepare for witness interview
4/27/2017	JF	1.2	MS/JF Conduct Witness Interview
4/27/2017	JS	0.5	assemble docs for MD call with witness
4/27/2017	JF	0.1	MD/JF Check-in re witness interview
4/27/2017	JF	0.6	MS/JF Meet to discuss 1. outcome/process re opt-in interview .4 2. ways to improve the interview process to hone in on specific aspects more effectively .2
4/27/2017	MD	0.1	MD/JF Check-in re witness interview
4/27/2017	MS	0.4	digesting Holton depo
4/27/2017	MS	1.2	MS/JF Conduct Witness Interview
4/27/2017	JF	0.2	MS/JF Meet to prepare for witness interview
4/27/2017	JS	0.3	Call to schedule witness interview evaluation call
4/28/2017	JS	0.1	Assemble and email docs to opt-in for review prior to phone call
4/28/2017	JS	0.1	Assemble and email docs to opt-in for review prior to phone call
4/28/2017	JS	0.1	Assemble and email docs to opt-in for review prior to phone call
4/28/2017	JS	0.1	Assemble and email docs to opt-in for review prior to phone call
4/28/2017	JS	2.3	Assemble documents for opt-in plaintiffs scheduled for trial witness evaluation phone calls
4/28/2017	MR	0.1	assist JF with column widths in case spreadsheet
4/28/2017	JF	0.3	Update/review witness interview master sheet
4/28/2017	JS	0.1	Assemble and email docs to opt-in for review prior to phone call
4/28/2017	JS	0.7	Witness interview call
5/1/2017	JS	0.3	Update witness evaluation call scheduling tracking sheet
5/1/2017	JF	0.3	Prepare interview form
5/1/2017	JF	0.2	MD/JF Check-in re 1. Plaintiff documents and their processing (production); 2. plaintiff inquiry re potential pension/401K benefits claims
5/1/2017	CM	0.1	CM/JF Discuss outreach strategies (certified letter) to get in touch with unresponsive plaintiffs/deponents
5/1/2017	JF	0.1	CM/JF Discuss outreach strategies (certified letter) to get in touch with unresponsive plaintiffs/deponents
5/1/2017	CLER	0.4	create PDF format of documents recd from client (paystubs/calendars)

Date	Staff	Amount of Time	Description
5/1/2017	JF	0.4	Prepare interview form
5/1/2017	JF	0.3	Call with Kellogg plaintiff re taxation of a potential settlement
5/1/2017	JF	0.1	Call to plaintiff re his inquiry
5/1/2017	CM	0.1	CM/JF Check-in re tax question from Kellogg plaintiff
5/1/2017	JF	0.7	Prepare certified letters to mail out to unresponsive deponents (preparation for trial)
5/1/2017	JS	0.4	Clean up notes from interview call and email to litigation team
5/1/2017	JF	1.1	Interview with potential trial witness
5/1/2017	JF	0.1	CM/JF Check-in re tax question from Kellogg plaintiff
5/1/2017	MD	0.2	MD/JF Check-in re 1. Plaintiff documents and their processing (production); 2. plaintiff inquiry re potential pension/401K benefits claims
5/1/2017	JF	0.1	Compose email to CM re plaintiff inquiry (taxes)
5/1/2017	JF	0.3	Prepare/print/process certified letters to unresponsive deponents
5/2/2017	CLER	0.1	prepare mailing (USPS Certified Return Receipt)
5/2/2017	CLER	0.1	prepare mailing (USPS Certified Return Receipt)
5/2/2017	CLER	0.1	prepare mailing (USPS Certified Return Receipt)
5/2/2017	MR	0.3	MS/MR Discuss upcoming meeting in May with opposing counsel
5/2/2017	JF	0.6	Edit witness interview
5/2/2017	JS	0.3	Call to schedule witness evaluation call
5/2/2017	MS	0.3	MS/MR Discuss upcoming meeting in May with opposing counsel
5/2/2017	JF	1.5	Conduct witness interview
5/2/2017	JF	0.1	Compose/send email to attorney re feedback on witness interviews
5/2/2017	JF	0.4	Update the witness interview status spreadsheet
5/2/2017	MS	0.4	tc w/ Boudreau to set settlement conf dates and agenda
5/2/2017	JF	0.2	Call with plaintiff re trial
5/3/2017	JF	0.2	JF/CM discuss how to respond to questions from opt-in re claims included in case
5/3/2017	CM	0.2	JF/CM discuss how to respond to questions from opt-in re claims included in case
5/3/2017	JS	1.8	Witness interview call
5/3/2017	JF	0.1	Call with Kellogg plaintiff about case update
5/3/2017	JF	0.1	Update contact information for plaintiff (change of address)
5/3/2017	JF	0.1	Call from plaintiff re case update
5/3/2017	MA	0.1	forward case information request to paralegals for review
5/3/2017	JF	0.4	Prepare form for plaintiff interview (trial preparation)
5/4/2017	JF	0.7	Edit/email notes re witness interview to team
5/4/2017	JF	0.2	Edit/email notes re witness interview to team
5/4/2017	AN	0.3	Telephone call from plaintiff for case update
5/4/2017	CLER	0.2	Transfer documents recd from PACER system to docket file and create file copy (Docket#51 - Joint MOTION for Approval of Settlement and Joint MOTION to Dismiss With Prejudice( NDGA 13-cv-00384
5/4/2017	JF	0.1	MD/JF Discuss relevance of plaintiff document for witness interview
5/4/2017	CLER	0.2	Transfer documents recd from PACER system to docket file and create file copy (Docket#107 - MOTION Preliminary Approval of Class Action Settlement (UNOPPOSED) CAND - 13-CV-04062 Settlement
5/4/2017	CLER	0.2	Transfer documents recd from PACER system to docket file and create file copy (Docket#MOTION Preliminary Approval of Class Action Settlement (Unopposed) CAND - C 15-00319 Settlement
5/4/2017	JF	0.6	Edit/email notes re witness interview to team
5/4/2017	JF	1	Conduct witness interview



Date	Staff	Amount of Time	Description
5/4/2017	JS	0.3	JS/JF/MD Discuss interview responses and develop further questions for possible trial witness
5/4/2017	JF	0.1	MD/JF Check-in re witness interview
5/4/2017	JS	0.9	Revise and clean up interview call notes for circulation, .8; email to litigation team, 1
5/4/2017	MD	0.1	MD/JF Check-in re witness interview
5/4/2017	JF	1.7	Conduct witness interview
5/4/2017	JF	0.3	JS/JF/MD Discuss interview responses and develop further questions for possible trial witness
5/4/2017	MD	0.3	JS/JF/MD Discuss interview responses and develop further questions for possible trial witness
5/4/2017	JS	0.2	Follow up email with additional questions
5/4/2017	MD	0.1	MD/JF Discuss relevance of plaintiff document for witness interview
5/5/2017	JS	1.9	Witness interview call
5/5/2017	JF	0.1	Reply to Kellogg plaintiff re her inquiry
5/5/2017	JF	0.5	Prepare interview form
5/5/2017	JF	1.5	Update witness interview spreadsheet with named plaintiff, class reps and deponents' testimonies/territory designations
5/5/2017	JF	0.2	CM/JF Check-in re workload
5/5/2017	CM	0.2	CM/JF Check-in re workload
5/5/2017	JF	0.3	JS/JF Check-in re the status of the witness interviews
5/5/2017	JF	1.5	Conduct witness interview
5/5/2017	JS	0.3	JS/JF Check-in re the status of the witness interviews
5/5/2017	MD	0.2	MD/JF Meet re 1. status of witness selection process; 2. next steps in the witness selection process
5/5/2017	JF	0.1	AR/JF Discuss the concept of "tolling" and how it applies to a specific case
5/5/2017	AG	0.1	AG/JF Review docket to figure out if tolling applies to case
5/5/2017	JF	0.2	MD/JF Meet re 1. status of witness selection process; 2. next steps in the witness selection process
5/5/2017	JF	0.2	Call with plaintiff re relevant documents
5/5/2017	JF	0.6	Prepare opt-in interview form
5/5/2017	JF	0.1	AG/JF Review docket to figure out if tolling applies to case
5/5/2017	JS	0.6	Type up notes from call
5/8/2017	MD	0.1	JF/MD/MR/JS Discuss severance letter compilation project
5/8/2017	JS	0.3	Review production to determine whether a given Bates range was previously produced; email results to team.
5/8/2017	MS	0.3	review witness interview forms and results
5/8/2017	JS	0.1	Update witness tracking spreadsheet
5/8/2017	JS	0.1	JF/MD/MR/JS Discuss severance letter compilation project
5/8/2017	JF	1.9	Update witness status spreadsheet
5/8/2017	JF	0.2	MD/JF Discuss the project to further refine/specify categories required to consider for trial witness selection
5/8/2017	JF	0.2	JS/JF Check-in re status of witness interview outreach
5/8/2017	JF	0.2	MD/JF Check-in re recent DEF production badge
5/8/2017	JF	0.8	Download/review DEF production (emailed on 5/4/2017)
5/8/2017	JF	0.2	Call from Kellogg opt-in re case update
5/8/2017	MD	0.2	MD/JF Check-in re recent DEF production badge
5/8/2017	JF	0.1	JF/MD/MR/JS Discuss severance letter compilation project
5/8/2017	JS	0.3	Call to update contact information
5/8/2017	MR	4.2	Work on qualification of new payroll data

Date	Staff	Amount of Time	Description
5/8/2017	JF	0.8	Review/update the witness status spreadsheet with relevant information (territory designation, etc.)
5/8/2017	MS	0.5	digesting Holton depo
5/8/2017	JS	0.2	JS/JF Check-in re status of witness interview outreach
5/8/2017	MD	0.2	MD/JF Discuss the project to further refine/specify categories required to consider for trial witness selection
5/8/2017	JF	0.1	Respond to email re latest DEF production
5/9/2017	MR	1.5	Continued work on new payroll data
5/9/2017	MD	0.1	MD/JF Check-in re witness status review to include more opt-ins to interview
5/9/2017	JF	0.2	MD/JF Check-in re witness selection (MF/Eastern&Southern Region)
5/9/2017	JF	0.1	Save the most recent DEF production into case folder (plaintiff severance agreements)
5/9/2017	MR	0.9	Continued work on new payroll data issues .5; Create list of 16 pairs of problem rows in payroll data .3; Send list with comments to atty MS .1
5/9/2017	MR	0.1	JF/MD/MR/JS Discuss severance letter compilation project
5/9/2017	JF	0.2	Call from Kellogg plaintiff re case update
5/9/2017	JF	0.1	MD/JF Check-in re witness status review to include more opt-ins to interview
5/9/2017	MR	0.1	MD/MR/JF Check-in re severance agreement (leatest DEF production)
5/9/2017	JF	1.4	Locate/review additional SN opt-ins to interview (for attorney review)
5/9/2017	JF	0.1	MD/MR/JF Check-in re severance agreement (leatest DEF production)
5/9/2017	JF	1.8	Locate/review additional MF/SN opt-ins to interview (for attorney review)
5/9/2017	MD	0.2	MD/JF Check-in re witness selection (MF/Eastern&Southern Region)
5/9/2017	MR	0.6	Examine previous severance study performed in early 2016; email info to team about plan .1
5/9/2017	MD	0.1	MD/MR/JF Check-in re severance agreement (leatest DEF production)
5/10/2017	JF	1.6	Review ROGs to locate additional potential witnesses
5/10/2017	MR	1.2	Locate severance records in all four job history files
5/10/2017	MD	0.1	MD/JF Check-in re opt-in potential witness outreach
5/10/2017	JS	1.2	Format opt-in witness outreach spreadsheet, add contact information for second round of calls
5/10/2017	JF	0.1	MD/JF Check-in re opt-in potential witness outreach
5/10/2017	MS	0.2	review mr examples of data issues
5/11/2017	JS	1.7	Draft emails for trial witness evaluation call scheduling (>16 emails)
5/11/2017	JF	0.3	MR/JF Brief Meeting re 1. comparison of DEF collective Group list with PLT list .2; 2. severance agreements project .1
5/11/2017	MS	0.6	digesting Holton testimony on JBPs and Planograms
5/11/2017	JS	0.1	JS/JF Check-in re recent case developments
5/11/2017	MR	0.3	MR/JF Brief Meeting re 1. comparison of DEF collective Group list with PLT list .2; 2. severance agreements project .1
5/11/2017	JF	0.2	MD/JF Meet re 1. the project to cross-check our PLT list against Kellogg's; 2. the project to select more potential trail witnesses from Western and Central regions; 3. the project to check RSMs' scorecards to ascertain whether or not they supervised 80+ hours of variable labor
5/11/2017	MS	0.3	email to J Boudreau re settlement conf agenda
5/11/2017	JF	2.8	Cross-check/compare DEF complete plaintiff list against our complete plaintiff list
5/11/2017	JF	0.1	Compose an email to team re comprehensive collective list

Date	Staff	Amount of Time	Description
5/11/2017	MD	0.2	MD/JF Meet re 1. the project to cross-check our PLT list against Kellogg's; 2. the project to select more potential trial witnesses from Western and Central regions; 3. the project to check RSMs' scorecards to ascertain whether or not they supervised 80+ hours of variable labor
5/11/2017	JF	0.1	JS/JF Check-in re recent case developments
5/12/2017	JF	0.3	Prepare potential witness interview form
5/12/2017	JF	0.1	Compose email re comprehensive collective group list comparison project to team
5/12/2017	JF	3.6	Select more opt-ins to conduct witness interviews
5/12/2017	MR	0.2	MR/JF Discuss 1. potential data cross-check process re PLT vs DEF comprehensive client lists; 2. severance agreement project
5/12/2017	JF	0.1	Reach out to potential trial witness for interview (interview cancelled, opt-in not available)
5/12/2017	MD	0.1	MD/JF Brief review of 1. next steps in comparison between DEF and PLT collective group list project; 2. witness interview selection process
5/12/2017	MS	0.2	review potential witness intake
5/12/2017	JF	0.2	MR/JF Discuss 1. potential data cross-check process re PLT vs DEF comprehensive client lists; 2. severance agreement project
5/12/2017	JS	0.6	Set up trial witness call
5/12/2017	JS	0.4	Set up trial witness call
5/12/2017	JF	0.1	MD/JF Brief review of 1. next steps in comparison between DEF and PLT collective group list project; 2. witness interview selection process
5/12/2017	JS	0.5	Set up trial witness call
5/15/2017	JF	0.2	Check-in with team re severance agreements task
5/15/2017	MD	0.2	ms/md review severance issue for Thomas class
5/15/2017	JS	0.1	Email documents to opt-in prior to phone call
5/15/2017	JF	0.1	Leave voicemail for opt-in to set up trial witness interview
5/15/2017	MS	0.2	ms/md review severance issue for Thomas class
5/15/2017	JF	0.1	Call to opt-in to set up trial witness interview (wrong number)
5/15/2017	JS	0.4	Assemble documents to send to possible trial witness for review prior to scheduled phone call
5/15/2017	JF	0.1	Leave voicemail for opt-in to set up trial witness interview
5/15/2017	JF	0.1	Leave voicemail for opt-in to set up trial witness interview
5/15/2017	JF	0.1	Leave voicemail for opt-in to set up trial witness interview
5/15/2017	JF	0.1	Call to opt-in to set up trial witness interview (wrong number)
5/15/2017	JF	0.1	MD/JF Check-in re potential severance agreement tasks (given Judge's ruling re opt-in state law claims)
5/15/2017	JF	0.3	Prepare interview form to conduct potential trial witness interview
5/15/2017	MS	0.7	digesting Holton testimony on JBPs and planograms
5/15/2017	JF	0.1	Call with opt-in to confirm witness interview
5/15/2017	JF	0.1	JS/JF Brief check-in re interview scheduling process
5/15/2017	JF	0.1	CM/JF Brief discussion of a potential bilingual trial witness interview (CM's availability)
5/15/2017	MD	0.1	MD/JF Check-in re potential severance agreement tasks (given Judge's ruling re opt-in state law claims)
5/15/2017	CM	0.1	CM/JF Brief discussion of a potential bilingual trial witness interview (CM's availability)
5/15/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#435 ORDER denying [430] Motion to Join Opt-Ins' State Law Claims for Collective Treatment)

Date	Staff	Amount of Time	Description
5/15/2017	AG	0.1	ECF Filing of NOTICE of Temporary Interruption of Telephone Service
5/15/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#436 - NOTICE of Temporary Interruption of Telephone Service)
5/15/2017	JF	0.1	MD/JF Discuss potential bilingual witness interview
5/15/2017	JS	0.3	Call re: trial witness call scheduling
5/15/2017	MS	0.4	md/ms strategize re court ordered settlement discussions with defense counsel 0.4
5/15/2017	JF	0.2	Conduct brief interview (PLT unable to travel during the scheduled trial time)
5/15/2017	JF	0.1	Call with opt-in to set up trial witness interview
5/15/2017	JF	0.1	MS/JF JF to assist MS to locate severance agreements from 2017 company-wide re-structuring
5/15/2017	JF	0.1	Call with opt-in to set up trial witness interview
5/15/2017	MD	0.1	MD/JF Discuss potential bilingual witness interview
5/15/2017	MD	0.4	md/ms strategize re court ordered settlement discussions with defense counsel 0.4
5/15/2017	JS	0.1	JS/JF Brief check-in re interview scheduling process
5/15/2017	JF	0.1	Update TM record with proper contact information
5/15/2017	JF	0.1	Leave VM for opt-in to set up trial witness interview
5/15/2017	MS	0.1	MS/JF JF to assist MS to locate severance agreements from 2017 company-wide re-structuring
5/15/2017	JF	0.2	Calls to opt-in to set up trial witness interview
5/15/2017	JF	0.1	Leave voicemail for opt-in to set up trial witness interview
5/15/2017	MS	0.1	email to ET re strategy issues
5/15/2017	MS	0.6	digesting KMF section of Holton Depo
5/16/2017	JS	0.4	Assemble documents to send to possible trial witness for review prior to call
5/16/2017	JF	0.1	MD/JF Brief check-in re workload
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JF	0.1	Respond to PLT email with updated mailing address
5/16/2017	JS	0.4	Assemble documents to send to possible trial witness for review prior to call
5/16/2017	JS	0.4	Draft email to second round of possible trial witnesses
5/16/2017	JF	0.6	Complete interview sheet in preparation for witness interview
5/16/2017	JS	0.5	Draft and send follow-up email to unresponsive opt-ins re: trial scheduling
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
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5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JF	0.8	Review opt-ins' records to schedule interview time to serve as potential trial witnesses
5/16/2017	MS	0.2	draft outline for settlement conference

Date	Staff	Amount of Time	Description
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	MR	0.5	ms/mr discuss timing and strategy for common data set and damages calculations for mediation
5/16/2017	MS	0.6	develop model damage set and share with Boudreau
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	MS	0.5	ms/mr discuss timing and strategy for common data set and damages calculations for mediation
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	JS	0.3	Draft and send email to possible trial witness asking for timeframe to schedule evaluation call
5/16/2017	MD	0.1	MD/JF Brief check-in re workload
5/17/2017	MD	7 2.5	Attend court ordered settlement discuss with defense counsel in NYC (2.5 travel to NYC; 2.5 return travel from NYC; 2.0 meeting in defense counsel's offices)
5/17/2017	JS	0.4	Determine how many opted-in prior to notice issuing, email result to MS and MD
5/17/2017	JS	0.1	Email to opt-in regarding trial witness preparation call.
5/17/2017	JF	1.8	Select additional opt-ins to interview for potential trial witnesses
5/17/2017	MS	7 2.5	Attend court ordered settlement discuss with defense counsel in NYC (2.5 travel to NYC; 2.5 return travel from NYC; 2.0 meeting in defense counsel's offices)
5/18/2017	MS	0.3	ms/md discuss follow up on settlement conference
5/18/2017	JF	2.1	Locate additional opt-ins to interview for witness stand response to MD question on costs for admin expenses and including payroll taxes in damages as per Boudreau's position
5/18/2017	MS	0.2	damages as per Boudreau's position
5/18/2017	MD	0.3	ms/md discuss follow up on settlement conference
5/18/2017	MS	0.1	email to Boudreau re possible mediators
5/18/2017	JF	0.4	Pre-fill the interview form for opt-in trial witness interview
5/18/2017	JS	0.2	MS/JS/JF Meet to discuss the outcome of the settlement conference
5/18/2017	MS	0.2	MS/JS/JF Meet to discuss the outcome of the settlement conference
5/18/2017	JS	1.7	Kellogg Witness Evaluation phone call
5/18/2017	JF	0.2	MS/JS/JF Meet to discuss the outcome of the settlement conference
5/18/2017	MS	1.2	digesting Holton testimony on JBP planning, displays, returns, etc.
5/18/2017	JF	0.1	Compose email to MD re potential bilingual interview for an opt-in
5/18/2017	JF	0.1	Call to opt-in to re-schedule bilingual interview
5/18/2017	JF	0.1	Call to opt-in re witness interview
5/18/2017	JS	0.2	Communicate with opt-in via email to schedule trial witness evaluation call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call

Date	Staff	Amount of Time	Description
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.5	Update new putative witness list with contact information
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	AN	0.1	Telephone call from plaintiff regarding details of case
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	AG	0.2	conduct bankruptcy search of client
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.3	Correspond via email re: Kellogg trial witness phone call scheduling; schedule call
5/19/2017	JS	0.2	Draft email to putative trial witness to schedule possible witness evaluation phone call
5/19/2017	JS	0.2	Draft and send email to putative trial witness to schedule possible witness evaluation phone call
5/22/2017	JS	0.4	Assemble and email documents to possible trial witness
5/22/2017	JS	0.3	Additional emails with opt-in to decide time for call
5/22/2017	JF	0.1	Compose email to team re Martin Little's return certified mail mailing
5/22/2017	JS	0.3	Schedule trial witness evaluation call
5/22/2017	JF	0.2	JS/JF Check-in re status of the opt-in trial witness interviews
5/22/2017	JS	0.3	Schedule trial witness evaluation call
5/22/2017	JF	0.1	MD/JF Brief check-in re timing of the RSM variable labor project (to be consulted with MR)
5/22/2017	JS	0.2	Schedule trial witness evaluation call
5/22/2017	JF	0.5	Prepare interview form
5/22/2017	JS	0.3	Scheduled call with opt-in for trial witness evaluation
5/22/2017	JF	0.2	Compose email to team re undeliverable mail to potential opt-ins
5/22/2017	JF	0.5	Prepare interview form
5/22/2017	JS	0.4	Assemble and email documents to possible trial witness
5/22/2017	MD	0.2	ms/md discuss trial strategy for Kellogg 30(b)(6) testimony



Date	Staff	Amount of Time	Description
5/22/2017	JS	0.3	Schedule trial witness evaluation call
5/22/2017	JS	0.3	Schedule trial witness evaluation call
5/22/2017	JS	0.3	Schedule trial witness evaluation call
5/22/2017	MS	0.2	ms/md discuss trial strategy for Kellogg 30(b)(6) testimony
5/22/2017	JF	0.1	Compose email to team re undeliverable certified mail
5/22/2017	MR	2.6	Initial work reconciling previous extrapolation calculations with new payroll data
5/22/2017	JF	0.1	Call to opt-in for witness interview
5/22/2017	JS	0.1	Draft and circulate email to litigation team about opt-in witness interview
5/22/2017	MS	0.1	follow up w/ Greenberg re mediators
5/22/2017	JS	0.2	JS/JF Check-in re status of the opt-in trial witness interviews
5/22/2017	JF	0.6	Revise/edit my interview notes to submit to litigation team
5/22/2017	MR	0.3	ms/mr update on settlement conference and data requirements
5/22/2017	MR	2.8	Continue prep of weekly payroll to ready for loading into damage calc framework 1.4; Prepare damage calcs framework 1.4
5/22/2017	JF	0.1	Compose email to MR and DM re RSM Variable Labor project meeting
5/22/2017	JF	1.6	Conduct opt-in potential trial witness interview
5/22/2017	CM	0.1	CM/JF Check-in re bilingual plaintiff trial witness interview
5/22/2017	MS	0.3	ms/mr update on settlement conference and data requirements
5/22/2017	MD	0.1	MD/JF Brief check-in re timing of the RSM variable labor project (to be consulted with MR)
5/22/2017	JF	0.1	CM/JF Check-in re bilingual plaintiff trial witness interview
5/23/2017	MD	0.1	MD/MR phone call about severance project priority
5/23/2017	MR	0.1	Send email about the need for severance project for mediation damage calcs
5/23/2017	JF	0.1	CM/JF Discuss the logistics of the bilingual interview
5/23/2017	JF	0.1	Draft an email to MD re the severance/separation agreement project (for MR)
5/23/2017	JF	0.3	Edit/distribute potential trial witness interview notes
5/23/2017	MD	0.1	MD/JF Check-in re paralegal responsibilities/tasks to accomplish for the day (status of witness interviews, RSM project)
5/23/2017	CM	0.1	CM/JF Discuss the logistics of the bilingual interview with opt-in
5/23/2017	JF	0.2	Locate/prep interview sheets for CM and JF
5/23/2017	CM	0.1	CM/JF Discuss the logistics of the bilingual interview
5/23/2017	MS	0.2	correspondence with Boudreau re mediator selection
5/23/2017	MR	0.1	JK/MR Discuss Kellogg calcs for trial
5/23/2017	JF	0.1	MD/JF Check-in re paralegal responsibilities/tasks to accomplish for the day (status of witness interviews, RSM project)
5/23/2017	JF	0.5	Prepare opt-in witness interview form
5/23/2017	MR	0.2	MR/JF Review in detail the severance/separation agreement project
5/23/2017	MS	0.2	investigating alternative mediators
5/23/2017	MR	2.8	Redo load of prior opt-in SN data into new damage calcs framework 1.2; Load prior opt-in MF data into new damage calcs framework .8; Load prior class data into new damage calcs framework .8
5/23/2017	JK	0.1	JK/MR Discuss Kellogg calcs for trial
5/23/2017	MR	7.2	Load new weekly payroll calc data into new damage calcs framework 1.7; Pull CTS data into new weekly payroll calc data .5; Pull TM code into new weekly payroll calc data .3; Pull job category data into new weekly payroll calc data .3; Separate new MF weekly payroll calc data from SN data 1.3; Copy formulas into all new payroll rows in damage calcs framework 1.0; Fix NYS LD and interest formulas .6; Load prior opt-in SN data into new damage calcs framework 1.5
5/23/2017	JS	0.3	Call for case update

Date	Staff	Amount of Time	Description
5/23/2017	JK	0.2	jk/mr Discuss taking over damage calculations for trial purposes.
5/23/2017	JF	0.1	CM/JF Discuss the logistics of the bilingual interview with opt-in
5/23/2017	JS	0.3	Additional refinement to scheduling
5/23/2017	MR	0.2	jk/mr Discuss taking over damage calculations for trial purposes.
5/23/2017	JK	0.2	MD/MS/JK Discuss taking over damage calculations for trial purposes.
5/23/2017	JF	1.2	CM/JF Conduct bilingual potential trial witness interview with an opt-in
5/23/2017	JF	0.2	MR/JF Review in detail the severance/separation agreement project
5/23/2017	CM	0.3	CM/JF Assess the outcome of potential trial witness interview with opt-in
5/23/2017	MR	0.1	MD/MR phone call about severance project priority
5/23/2017	MD	0.2	MD/JF Meet re severance project
5/23/2017	CM	1.2	CM/JF Conduct bilingual potential trial witness interview with an opt-in
5/23/2017	MS	0.2	review interview notes of potential witness and respond
5/23/2017	CM	0.3	review interview form in preparation for assisting with interview of Spanish speaking client
5/23/2017	JF	0.2	MD/JF Meet re severance project
5/23/2017	JF	0.3	CM/JF Assess the outcome of potential trial witness interview with opt-in
5/23/2017	MS	0.2	MD/MS/JK Discuss taking over damage calculations for trial purposes.
5/23/2017	MD	0.2	MD/MS/JK Discuss taking over damage calculations for trial purposes.
5/23/2017	JF	0.1	Respond to email re potential trial witness interview
5/24/2017	JS	0.5	Assemble and email documents for review prior to witness evaluation phone call
5/24/2017	JF	1.2	Check Kellogg personnel folders to locate signed severance agreements
5/24/2017	JS	0.4	Assemble documents for plt review prior to trial witness phone call
5/24/2017	MR	0.5	MS/MR/MD (part .2) update on meeting with opposing counsel about mediation
5/24/2017	JS	0.2	Draft and send email attempting to reschedule opt-in trial witness phone call
5/24/2017	JS	0.4	Assemble and email documents for review prior to witness evaluation phone call
5/24/2017	CM	0.1	CM/JF Consult re potential trial witness interview (CM served as an interpreter)
5/24/2017	JS	1.4	Trial Witness evaluation call
5/24/2017	JF	0.1	CM/JF Consult re potential trial witness interview (CM served as an interpreter)
5/24/2017	JF	0.4	Edit/distribute notes re potential trial witness interview
5/24/2017	MS	0.5	MS/MR/MD (part .2) update on meeting with opposing counsel about mediation
5/24/2017	MD	0.2	MS/MR/MD (part .2) update on meeting with opposing counsel about mediation
5/24/2017	JS	0.2	Emails with opt-in to narrow possible call schedule
5/24/2017	MR	2.6	Transfer files to home computer for work session .1; Investigate anomalies in damage calcs .7; compare new and prior damage calcs .8; Redo class information in new damage calcs 1.0;
5/24/2017	JS	0.2	Draft and send email attempting to reschedule opt-in trial witness phone call
5/25/2017	JS	0.3	Assemble and email documents for opt-in review prior to trial witness evaluation phone call
5/25/2017	JS	0.2	Email to opt-in to attempt scheduling a call for trial witness evaluation purposes.
5/25/2017	JF	0.3	JS/JF Discuss the progress of scheduling/evaluation of opt-in interviews for trial witnesses
5/25/2017	JF	1.3	Check Kellogg personnel folders to locate signed severance agreements

Date	Staff	Amount of Time	Description
5/25/2017	JS	0.3	JS/JF Discuss the progress of scheduling/evaluation of opt-in interviews for trial witnesses
5/25/2017	JF	0.1	Update the master spreadsheet with relevant witness interview feedback
5/25/2017	MR	0.7	Continue work on extrapolation #5 evaluating some opt-ins job history
			Work on extrapolation #6 .4; Develop approach to handle extrapolations 1.0; Create to-do list for extrapolations .6; Remove opt-outs from extrapolations .5; Incorporate lookup table from March2017 history .6; Incorporate lookup table for last date in covered job .6; Incorporate lookup table for last date in calcs .6; Create various SOL lookup equations 2.2; Work on extrapolation #3 1.1; Work on extrapolation #4 1.0; Work on extrapolation #5 .6; Work on extrapolation #2/2a 1.2; Investigate KY SOL in extrapolation #1 .9; Fix
5/25/2017	MR	11.8	some #1 extrapolations .5
5/25/2017	MS	0.2	review potential witness intake
5/25/2017	MS	0.5	digesting store manager email sections of Holton deposition
5/25/2017	JF	0.4	Prepare interview notes for opt-in potential trial witness interview
5/25/2017	JF	1.1	Review/update master spreadsheet with plaintiff interview
5/25/2017	JS	0.1	Email documents for review prior to call to alternate email address per opt-in request
5/25/2017	JF	1.5	Conduct potential trial witness interview
5/25/2017	JF	1.2	Check Kellogg personnel folders to locate signed severance agreements
			Revise and clarify notes from trial witness evaluation phone call; circulate notes to
5/25/2017	JS	0.6	litigation team along with analysis.
5/26/2017	JF	1.5	Conduct interview with potential trial witness
5/26/2017	MS	0.5	email to Boudreau re conditions for using Rottman
5/26/2017	JS	0.2	JS/JF Check-in re status of the witness interview schedule
5/26/2017	JF	0.2	JS/JF Check-in re status of the witness interview schedule
5/26/2017	MS	0.1	follow up email to Boudreau re Rottman availability
5/26/2017	JF	0.1	Send email to MD and MR re severance project
5/26/2017	JS	0.3	Call to schedule witness call evaluation
5/26/2017	MD	0.2	md/ms confer re response to defense counsel re mediation 0.2
5/26/2017	MD	0.1	review email to send to defense counsel re mediation 0.1
5/26/2017	MS	0.2	md/ms confer re response to defense counsel re mediation 0.2
			Reschedule Trial Witness evaluation call per opt-in request (email communication
5/26/2017	JS	0.3	between Firm and opt-in, rescheduling in calendar)
5/26/2017	JS	0.2	Schedule opt-in for Trial Witness Evaluation phone call
			Finish the project to check Kellogg personnel folders to locate signed severance
5/26/2017	JF	2.3	agreements
			Study extrapolations for gaps between old and new data 1.8; Investigate first date
			problem with new data and method to fix 1.5; Fix damage calcs dates of new weekly data
			1.5; Add Action Type lookup to damage calcs 1.4; Add Covered Types lookup to damage
5/27/2017	MR	7.6	calcs 1.4
			Fix remaining dates of new weekly data 1.5; Study remaining extrapolations for gaps
			between old and new data 1.5; Study extrapolations for gaps after data 1.5; Add Action
			Type lookup to combined history 1.4; Add Covered Types lookup to combined history
			1.4; Add Last Entry to combined history 1.2; Add Last Date in covered job to combined
			history 1.2; Add Last Date in Calcs to combined history 1.2; Add Needs Extrap to
			combined history 1.2; Add Current to combined history 1.2; Examine results for last dates
			in combined history 1.9; Examine results for current in combined history 1.9; Add new
5/28/2017	MR	13	info to Extrapolations #1,2,3 2.0

Date	Staff	Amount of Time	Description
5/29/2017	MR	5.1	Study start dates for extrapolations 2.2; Continue working on start date extrapolation approach 2.9
5/30/2017	JS	0.4	Email correspondence with opt-in to reschedule trial witness phone call
5/30/2017	JF	0.2	Call from opt-in re documents that he has in his possession related to his time as a Vacation Relief
5/30/2017	JF	0.2	MR/JF Discuss the outcome of severance agreements project, its impact on damages
5/30/2017	JS	0.4	Pre-fill interview template with information from various sources (Interrogatories, production) to ensure efficiency of interview process
5/30/2017	MR	0.2	MR/JF Discuss the outcome of severance agreements project, its impact on damages
5/30/2017	JF	0.2	MD/MR/JF Meet re the project to estimate variable labor hours utilized by RSM opt-ins
5/30/2017	JS	0.2	Email documents to opt-in for review prior to trial witness evaluation call
5/30/2017	JF	0.1	Call from opt-in re change of email address
5/30/2017	MR	6.8	Correct lookup tables for last date of covered period 1.6; Extend lookup equations for class members 1.7; Examine dups in draft damage calcs 1.0; Check fixed version of last date of covered period 1.5; Check various extrapolation markers 1.0
5/30/2017	JS	0.4	Assemble documents for opt-in review prior to trial witness evaluation phone call
5/30/2017	JS	0.4	Assemble files for opt-in review prior to trial witness phone call
5/30/2017	JS	0.2	Email documents opt-in review prior to trial witness evaluation phone call
5/30/2017	JS	0.2	Email documents opt-in review prior to trial witness evaluation phone call
5/30/2017	JF	0.6	Prepare form to interview opt-in
5/30/2017	MD	0.2	MD/MR/JF Meet re the project to estimate variable labor hours utilized by RSM opt-ins
5/30/2017	JF	1.6	Trial witness opt-in interview
5/30/2017	JS	0.2	Email documents opt-in review prior to trial witness evaluation phone call
5/30/2017	MR	0.2	MD/MR/JF Meet re the project to estimate variable labor hours utilized by RSM opt-ins
5/30/2017	JS	0.2	Email documents to opt-in for review prior to trial witness evaluation call
5/30/2017	JF	0.1	Call to deposed plaintiff re availability for trial
5/30/2017	JS	0.2	Email docs for opt-in review prior to trial witness evaluation phone call
5/30/2017	JS	0.2	Email docs for opt-in review prior to trial witness evaluation phone call
5/30/2017	JS	0.3	Email correspondence with opt-in to schedule trial witness evaluation phone call
5/31/2017	JS	1.6	Trial witness evaluation interview
5/31/2017	JS	0.1	Call to reschedule trial witness evaluation call
5/31/2017	MR	3.4	Adjust "needs end date extrapolation column" 1.1; Write script for extrapolation weeks 2.3
5/31/2017	MR	6.1	Start assembly of extrapolation sets 6.1
5/31/2017	JF	0.2	Call with a previously deposed plaintiff re case update/trial dates
5/31/2017	JS	0.2	Email to schedule trial witness phone call - unavailable
6/1/2017	JF	0.1	Call plaintiff to schedule witness interview
6/1/2017	JF	0.1	Schedule time to meet with MD re status of witness interviews
6/1/2017	JF	0.2	Call from opt-in re witness interview
6/1/2017	JF	0.4	Review/update the trial witness status spreadsheet with completed interviews
6/1/2017	JF	0.2	Call to opt-in re schedule of witness interview

Date	Staff	Amount of Time	Description
			Copy work files from flash drive to server .1; Finish last sets of extrapolation 4.8; Collate
6/1/2017	MR	7.5	all 10 sets of extrapolation 2.5; Copy work files to flash drive .1
6/1/2017	MD	0.2	MD/JF Meet re potential trial witness status
6/1/2017	JF	1.4	Interview potential trial witness
6/1/2017	JF	0.2	MD/JF Meet re potential trial witness status
6/1/2017	JF	0.5	Prepare interview sheet for trial witness interview
6/1/2017	JF	0.7	Work on review/add of more opt-ins to potential trial witnesses
6/1/2017	MR	2.7	Sort and dedup collated set of extrapolations
6/2/2017	AN	0.2	JS/AN Research location of case files with documents regarding job descriptions
6/2/2017	MS	0.2	review potential witness interviews
6/2/2017	MR	0.5	ms/md/mr discuss revised Kellogg damage calcs
6/2/2017	MS	0.5	ms/md/mr discuss revised Kellogg damage calcs
6/2/2017	MR	5.5	Work on discussed changes to calcs 4.5; Create framework-of-calcs version of calcs 1.0
6/2/2017	MD	0.5	ms/md/mr discuss revised Kellogg damage calcs
6/2/2017	JF	0.2	Call with Kellogg opt-in to schedule witness interview
6/2/2017	JS	1.4	Kellogg Trial Witness evaluation phone call
6/2/2017	MD	2.5	review witness interview notes for witness selection 2.5
6/2/2017	MD	1	research W.D. Wash. adr list of neutrals to propose to defense counsel 1.0
6/2/2017	MD	0.1	email local counsel re WD Wash adr list neutrals to propose to defense counsel 0.1
6/2/2017	MS	0.1	email to Boudreau re timing on common data set
6/2/2017	MS	0.2	review WDWA mediator list
6/2/2017	MD	1	research jury instructions 1.0
6/2/2017	MR	3.7	Work on updating damage calcs 1.1; Create def version of damages calcs 2.6
6/2/2017	JS	0.2	JS/AN Research location of case files with documents regarding job descriptions
6/3/2017	MR	4.2	work on discussed changes to framework version 3.0; work on draft comments regarding framework 1.0; compose email to attorneys about revised framework/comments .2
6/5/2017	MD	3.5	draft internal to do list with deadlines for trial 3.5
6/5/2017	JS	0.3	Call for update, updated contact information
6/5/2017	MS	0.3	review and revise common data set and accompanying comments
6/5/2017	MS	0.1	email circulating common data set and accompanying comments
6/5/2017	MS	0.3	revise trial plan based on conf w/ md
6/5/2017	MD	2	md/ms frame trial arguments 2.0
6/5/2017	MS	2	md/ms frame trial arguments 2.0
6/5/2017	MS	0.5	digesting Holton testimony on forecasting
6/6/2017	JS	0.4	Format and clarify interview notes; circulate to team with assessment
6/6/2017	JS	0.4	Format and clarify interview notes; circulate to team with assessment
6/6/2017	MD	0.1	email listserve re travel agent needs for trial organization 0.1
6/6/2017	AG	0.2	conduct address check for current contact infor.
6/6/2017	MS	0	review additional internal trial deadlines 0.1
6/6/2017	MR	0.4	Locate prior email documenting the possible limited usefulness of the Motus data .3; Send email to MS with comments .1
6/6/2017	MD	0.3	review interview notes from JS interviews conducted today 0.3
6/6/2017	MR	0.5	strategize re damage calculations, including who internally will perform work for trial (md/mr)

Date	Staff	Amount of Time	Description
6/6/2017	MR	0.6	Read and reply to MD about his request for a report of plaintiffs who worked various divisions and regions .2; Search for report containing regions .4
6/6/2017	MD	3.5	review witness notes/interviews for trial selection of witnesses 3.5
6/6/2017	MD	0.5	strategize re damage calculations, including who internally will perform work for trial (md/mr)
6/6/2017	MD	0.2	confer re type expert for needed for trial 0.2
6/6/2017	JS	1.5	Trial Witness Evaluation call
6/6/2017	JS	0.3	Call to opt-in for trial witness evaluation interview--rescheduled forward two weeks
6/6/2017	MD	0.1	review additional internal trial deadlines 0.1
6/6/2017	MS	0.2	confer re type expert for needed for trial 0.2
6/6/2017	MD	0.4	JS/MD discuss spread of possible witnesses; ensuring we have geographic and divisional coverage; outreach method
6/6/2017	JS	0.4	JS/MD discuss spread of possible witnesses; ensuring we have geographic and divisional coverage; outreach method
6/6/2017	MD	0.3	review notes for witness who worked in category management position for purpose of conducting another interview 0.3
6/7/2017	MD	1.2	read 9th circuit civil jury instructions 1.2
6/7/2017	JS	0.8	Assemble and email docs for review prior to trial witness evaluation call
6/7/2017	MD	0.6	call with client about work in role as assistant to category management 0.6
6/7/2017	MR	0.3	Exchange multiple emails with MD about the needs for a Rep by Region report .3
6/7/2017	JS	1.6	Kellogg Trial Witness Evaluation
6/7/2017	AG	0.2	prepare Certified mailing to witness
6/7/2017	AG	1	Research Judge Jury Instructions
6/7/2017	MD	1.5	edit jury instructions for trial 1.5
6/7/2017	JS	0.4	Call with opt-in; updated contact information
6/7/2017	MD	1.5	research FLSA jury instructions on westlaw 1.5
6/7/2017	MS	0.2	review Kellogg's mediator suggestions
6/7/2017	JS	1.5	Trial Witness Evaluation Call
6/7/2017	MR	2.6	combine 298745 and SAP March 2017 lists 1.0; work on list of rep per region, division, covered position, time period 1.6;
6/7/2017	MS	0.1	review and comment on potential witness intake
6/7/2017	MD	0.6	JS/MD follow-up call with opt-in as possible witness for trial
6/7/2017	JS	0.6	JS/MD follow-up call with opt-in as possible witness for trial
6/8/2017	MD	4.5	digest deposition for trial 4.5
6/8/2017	MD	0.3	outline client testimony for trial 0.3
6/8/2017	MD	1.3	review jury instructions per AG research 1.3
6/8/2017	JS	0.2	JS/MD discuss narrowing down pool of Eastern and Southern region witnesses; criteria for selection
6/8/2017	JS	0.3	JS/MD discuss result of witness evaluation call; determine disposition of witnesses yea/nay
6/8/2017	JS	0.3	JS/Mr discuss optimal database to use for witness evaluation in order to contact and schedule witness evaluation calls
6/8/2017	MR	0.1	Send additional comments to MD about considerations about developing a Rep by Region report
6/8/2017	MD	0.2	JS/MD discuss narrowing down pool of Eastern and Southern region witnesses; criteria for selection
6/8/2017	AG	2	Research jury instructions (FLSA, Judge, Title VIVI)
6/8/2017	JS	1.7	Trial Witness evaluation phone interview



Date	Staff	Amount of Time	Description
6/8/2017	JS	0.7	Sign up for Google Doodle scheduling account, .2; design schedule to email to possible witnesses for scheduling evaluation interviews, .5
6/8/2017	JS	0.3	Format notes from witness interview and circulate to litigation team
6/8/2017	MR	4.3	Complete work on Opt-in by Region, Division, Job, Date of Employment report to satisfy various project needs 4.1; Email report to para JS and attorney MD with detailed explanation .2
6/8/2017	JS	0.4	Pre-filled interview template for opt-in interview call
6/8/2017	JS	0.3	Format notes from witness interview and circulate to litigation team
6/8/2017	MR	0.3	JS/Mr discuss optimal database to use for witness evaluation in order to contact and schedule witness evaluation calls
6/8/2017	JS	0.2	Call with opt-in regarding severance agreement and impact on claims
6/8/2017	MD	0.3	JS/MD discuss result of witness evaluation call; determine disposition of witnesses yea/nay
6/9/2017	JS	0.6	Create Doodle scheduler for opt-in sign-up for call scheduling
6/9/2017	JS	1.7	Isolate and pull potential witness pool from Eastern and Southern SN opt-ins
6/9/2017	JS	0.4	Draft and send email to opt-ins for witness call sign-ups
6/9/2017	JS	0.2	Call for cases status update
6/12/2017	JS	0.4	Assemble and send documents for plaintiff review prior to witness evaluation phone call
6/12/2017	JF	1.6	Conduct trial witness interview
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	JS	2	Schedule trial witness evaluation call
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	MS	0.5	drafting outline of possible expert witness testimony
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	MS	0.1	respond to Prof Otto re expert search
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	JS	0.2	JS/JF Check-in re status of trial witness interview calls
6/12/2017	JF	0.2	JS/JF Check-in re status of trial witness interview calls
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/12/2017	JS	0.4	Reschedule interview call per client request, .2; re-send documents per request, .2
6/12/2017	JS	0.2	Schedule trial witness evaluation call
6/13/2017	MR	0.3	MR/JF Review the process to calculate RSM Variable Labor allocations (trial research)
6/13/2017	MS	0.5	research on specific experts
6/13/2017	JF	0.3	MR/JF Review the process to calculate RSM Variable Labor allocations (trial research)
6/13/2017	MR	0.2	Email the Opt-in by Region report to para JF .1, Save Opt-in by Region report to server .1
6/13/2017	MS	0.2	email to et re expert witness admissibility
6/13/2017	MS	0.2	dg/ms discuss use of expert for Kellogg trial
6/13/2017	MS	1.2	research on expert witness testimony
6/13/2017	DG	0.2	dg/ms discuss use of expert for Kellogg trial
6/14/2017	MR	2.5	Begin work on incorporating damages framework changes into Defendant damages calculations

Date	Staff	Amount of Time	Description
6/14/2017	MS	0.2	md/ms review list of mediators and their availability for mediation with defense counsel per court order 0.2
6/14/2017	MD	0.2	md/ms review list of mediators and their availability for mediation with defense counsel per court order 0.2
6/14/2017	JS	0.4	Update calendar and spreadsheet with new interviewees and their scheduled dates
6/14/2017	MS	2	digest Chew deposition
6/14/2017	MD	0.2	mr/md/ms discuss producing damage calcs to Kellogg
6/14/2017	MS	0.2	mr/md/ms discuss producing damage calcs to Kellogg
6/14/2017	MD	0.2	md/ms discuss how to introduce evidence of Kellogg structure at trial
6/14/2017	MR	0.2	mr/md/ms discuss producing damage calcs to Kellogg
6/14/2017	MS	0.2	md/ms discuss how to introduce evidence of Kellogg structure at trial
6/15/2017	MD	0.1	MD/JF Check-in re Variable labor calculations project
6/15/2017	JF	0.1	MD/JF Check-in re Variable labor calculations project
6/15/2017	MR	0.2	MD/MR/AN/JF Review the task of calculating/compiling spreadsheet of variable labor hours for Retail Sales Manager position opt-ins
6/15/2017	MD	0.2	MD/MR/AN/JF Review the task of calculating/compiling spreadsheet of variable labor hours for Retail Sales Manager position opt-ins
6/15/2017	AN	0.2	MD/MR/AN/JF Review the task of calculating/compiling spreadsheet of variable labor hours for Retail Sales Manager position opt-ins
6/15/2017	JS	0.2	Call for case update
6/15/2017	JF	0.2	MD/MR/AN/JF Review the task of calculating/compiling spreadsheet of variable labor hours for Retail Sales Manager position opt-ins
6/15/2017	MR	4.5	Continued work on revision of Defendant version of damages to conform to framework
6/15/2017	JF	0.2	AN/JF Brief overview of the task to perform variable labor calculations (Retail Sales Manager position)
6/15/2017	JF	0.2	Schedule opt-in for a trial witness interview
6/15/2017	AN	0.2	AN/JF Brief overview of the task to perform variable labor calculations (Retail Sales Manager position)
6/15/2017	JF	0.1	MR/JF Check-in re the task to perform variable labor calculations for Retail Sales Representatives
6/15/2017	MR	0.1	MR/JF Check-in re the task to perform variable labor calculations for Retail Sales Representatives
6/15/2017	JS	1.4	Witness interview call
6/15/2017	MR	2.5	Initial work on RSM worksheet
6/16/2017	MS	0.4	md/ms meet to discuss revised damage calculations for defense counsel for settlement
6/16/2017	MD	0.3	md/ms/mr meet to discuss changes needed to damage calculations for presentation to defense counsel for settlement 0.3
6/16/2017	MR	0.3	md/ms/mr meet to discuss changes needed to damage calculations for presentation to defense counsel for settlement 0.3
6/16/2017	MR	1.8	Make additional modifications to Defendant version of new damage calculations as per meeting with attys 1.7, send email to attorneys with new calcs and explanations .1
6/16/2017	MS	0.3	final edit of revised damages to Kellogg counsel for settlement purposes
6/16/2017	MD	0.4	md/ms meet to discuss revised damage calculations for defense counsel for settlement
6/16/2017	AN	1	Record variable labor hours as noted on Kellogg Scorecards onto spreadsheet for multiple plaintiffs

Date	Staff	Amount of Time	Description
6/16/2017	JF	0.1	Send AN link to scorecards (to conduct RSM task)
6/16/2017	JS	0.4	Use FTP to send damages to opposing counsel
6/16/2017	JF	0.2	MR/AN/JF Review task to calculate variable labor hours for Retail Sales Managers/RSMs
6/16/2017	MR	1.3	Continued work on revised Defendant damages calculations 1.2; send draft version of calculations to attorneys .1
6/16/2017	MR	1	Finish work on RSM variable labor worksheet .9; email worksheet to paras JF and AN .1
6/16/2017	MR	0.2	MR/AN/JF Review task to calculate variable labor hours for Retail Sales Managers/RSMs
6/16/2017	AN	0.2	MR/AN/JF Review task to calculate variable labor hours for Retail Sales Managers/RSMs
6/19/2017	MD	0.1	call client to discuss mediation 0.1
6/19/2017	MD	0.3	md/ms confer re Court ordered mediation date/time and teams members who will attend mediation
6/19/2017	MS	0.3	md/ms confer re Court ordered mediation date/time and teams members who will attend mediation
6/19/2017	MS	0.1	correspondence to NKA re jury instruction models
6/19/2017	MD	0.1	MD/JF Check-in re status of the trial witness interview
6/19/2017	JF	0.1	MD/JF Check-in re status of the trial witness interview
6/19/2017	MS	0.1	email to GT re updated damage calculations
6/19/2017	MS	0.3	revise damage calculations to included updated fees
6/19/2017	MS	0.2	revise trial plan documents based on Chew depo review
6/19/2017	MS	0.2	emails to local counsel re mediation attendance and timing
6/19/2017	MS	0.4	finish review and notes on Chew Deposition
6/19/2017	JF	0.3	MD/JF Brief meeting re the status of the opt-in trial witness interviews
6/19/2017	CM	1.3	update case fees and costs for mediation
6/19/2017	JF	1.9	Review/update the opt-in trial witness interviews master sheet
6/19/2017	MD	0.3	MD/JF Brief meeting re the status of the opt-in trial witness interviews
6/19/2017	JS	0.2	Send updated damages to opposing counsel via FTP
6/20/2017	MD	0.7	compile jury instructions for trial 0.7
6/20/2017	JF	0.3	MD/JF Meet re the trial witness interview status
6/20/2017	MD	0.1	email response to defense counsel re court ordered mediation 0.1
6/20/2017	MD	0.1	md/mr confer about deadline to prepare plaintiffs' version of damages for mediation 0.1
6/20/2017	MD	2	develop draft witness testimony dates along with order of plaintiffs 2.0
6/20/2017	JS	0.5	Assemble docs for opt-in review prior to phone call, .4, email to opt-in, .1
6/20/2017	MD	0.3	MD/JF Meet re the trial witness interview status
6/20/2017	MR	0.1	md/mr confer about deadline to prepare plaintiffs' version of damages for mediation 0.1
6/20/2017	MD	1	review JS/JF list of potential trial witnesses and identify missing components for reaching out to additional clients to testify 1.0
6/20/2017	JS	0.3	Call from opt-in for status update; let us know about a recent situation with Kellogg
6/20/2017	AN	1.5	Update spreadsheet with data from scorecards with monthly variable labor hours for multiple plaintiffs
6/20/2017	JS	1.6	Trial Witness Evaluation phone call
6/20/2017	JS	0.4	Assemble and email documents for opt-in review prior to trial witness evaluation call
6/20/2017	AN	0.1	Telephone call from plaintiff with questions about case

Date	Staff	Amount of Time	Description
6/20/2017	JS	1.6	Kellogg Trial Witness interview
			MD/AN Review spreadsheet containing variable labor hours transferred from scorecards
6/21/2017	AN	0.1	for multiple plaintiffs
6/21/2017	JF	0.2	Review/send email to team re new production received from the Defendants
6/21/2017	MD	0.3	prepare for call with travel agent for witnesses to travel to trial in Tacoma, Wash 0.3
6/21/2017	JS	0.4	JS/MD call with Travel Agency re: trial schedule and logistics planning
6/21/2017	MD	3.5	review and compile jury instructions 3.5
6/21/2017	MS	0.2	reach out to NKA for jury instructions examples
6/21/2017	MD	0.4	JS/MD call with Travel Agency re: trial schedule and logistics planning
6/21/2017	JF	0.1	Re-schedule potential trial witness interview
			MD/AN Review spreadsheet containing variable labor hours transferred from scorecards
6/21/2017	MD	0.1	for multiple plaintiffs
			Update spreadsheet with data from scorecards indicating variable labor hours for
6/21/2017	AN	3	multiple plaintiffs
6/22/2017	JF	0.1	MD/JF Check-in re the status of the opt-in trial witness interviews
6/22/2017	JS	0.2	Call to schedule trial witness evaluation phone call
6/22/2017	MD	0.1	MD/JF Check-in re the status of the opt-in trial witness interviews
6/22/2017	JF	1.8	Call with a potential trial witness opt-in
6/22/2017	JF	0.1	MD/JF Check-in re an issue encountered with the opt-in trial witness interview
6/22/2017	MD	0.1	MD/JF Check-in re an issue encountered with the opt-in trial witness interview
6/22/2017	JS	0.1	Email to opt-in re: scheduling call
6/22/2017	JF	0.2	Re-check with opt-in re pre-planned display (trial witness interview process)
6/22/2017	JS	0.2	Review opt-in email, respond with question about scheduling call as trial witness
			Locate and assemble documents for opt-in review prior to trial witness evaluation phone
6/22/2017	JS	0.5	call
6/22/2017	JS	0.1	Email documents to opt-in for review prior to trial witness evaluation phone call
			Locate and assemble documents for opt-in review prior to trial witness evaluation phone
6/22/2017	JS	0.4	call
6/22/2017	JS	0.1	Email documents post-interview to opt in for review and follow up
			Locate and assemble documents for opt-in review prior to trial witness evaluation phone
6/22/2017	JS	0.4	call
6/22/2017	JS	0.1	Email documents for opt-in review prior to trial witness evaluation phone call
6/22/2017	JS	0.1	Email documents for opt-in review prior to trial witness evaluation phone call
6/22/2017	JS	0.4	Locate and assemble docs to send pos-interview for opt-in review and follow up
			Email documents to opt-in, for opt-in review prior to/during trial witness evaluation
6/23/2017	JS	0.1	phone call
6/23/2017	JF	1.6	Conduct potential trial witness interview
6/23/2017	JF	0.1	Save correspondence with Defendants into case folder (mediation)
6/23/2017	JS	0.1	Update contact information for opt-in
			Locate and assemble documents for opt-in review prior to/during trial witness evaluation
6/23/2017	JS	0.4	phone call
6/26/2017	AG	0.1	ECF Filing of NOTICE of Change of Address
6/27/2017	JF	0.2	Call from potential trial witness re pre-planned displays
6/27/2017	JF	0.2	MD/JF Check-in re witness outreach status
			JF/AN Review spreadsheet of plaintiffs needing interviews scheduled to choose trial
6/27/2017	JF	0.2	witnesses

Date	Staff	Amount of Time	Description
6/27/2017	JF	0.1	Draft/send email to opt-in to confirm trial witness interview time
6/27/2017	JF	0.1	Draft/send email to opt-in to confirm trial witness interview time
6/27/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#437 NOTICE of Change of Address)
6/27/2017	AN	0.2	JF/AN Review spreadsheet of plaintiffs needing interviews scheduled to choose trial witnesses
6/27/2017	JF	0.1	Call to opt-in re scheduling of trial witness interview
6/27/2017	JF	0.2	Call to opt-in re re-scheduling of his trial witness interview
6/27/2017	JF	0.1	MR/JF Discuss the timing of potential trial witness interview for this Thursday, 6/29
6/27/2017	JF	0.4	Prepare interview sheet
6/27/2017	JF	1.6	Conduct interview with a potential trial witness
6/27/2017	MD	0.2	MD/JF Check-in re witness outreach status
6/27/2017	MR	0.1	MR/JF Discuss the timing of potential trial witness interview for this Thursday, 6/29
6/28/2017	JF	0.2	Call from plaintiff re case update
6/28/2017	JF	0.2	Call from deponent re case update
6/28/2017	AN	0.5	Make telephone calls to plaintiffs to schedule trial witness interviews
6/28/2017	JF	0.2	MD/JF Check-in re scheduling witness interviews with Retail Sales Managers
6/28/2017	MD	0.2	MD/JF Check-in re opt-in trial witness interview
6/28/2017	MD	0.2	MD/JF Check-in re scheduling witness interviews with Retail Sales Managers
6/28/2017	JF	0.2	MD/JF Check-in re opt-in trial witness interview
6/28/2017	MD	2	drafting mediation statement 2.0
6/29/2017	AN	1	Contact multiple plaintiffs by telephone to schedule trial witness interviews
6/29/2017	AN	0.3	Telephone call with plaintiff to discuss setting up time for trial witness interview
6/29/2017	AN	0.3	Telephone call with plaintiff to discuss scheduling telephone interview for trial witness search
6/29/2017	AN	0.3	Telephone call to plaintiff to schedule trial witness interview
6/29/2017	AN	0.3	Telephone call with plaintiff to schedule trial witness interview
7/5/2017	JF	1.5	Conduct trial witness interview
7/5/2017	JS	0.4	Assemble and email documents to opt-in prior to trial witness evaluation phone call
7/5/2017	JF	0.2	MD/JF Meet/discuss the status of the potential trial witness outreach
7/5/2017	MD	0.2	MD/JF Meet/discuss the status of the potential trial witness outreach
7/5/2017	JS	0.2	Email rescheduling request to possible trial witness
7/5/2017	AN	1.5	Call multiple plaintiffs regarding scheduling telephone interviews for trial witnesses
7/5/2017	AN	0.1	JF/AN Discuss task of outreach to plaintiffs to schedule trial witness interviews
7/5/2017	JF	0.1	JF/AN Discuss task of outreach to plaintiffs to schedule trial witness interviews
7/5/2017	JS	0.5	Assemble and email documents to opt-in prior to trial witness evaluation phone call
7/6/2017	JF	0.2	AN/JF Meet re potential trial witness outreach
7/6/2017	JF	0.1	Call opt-in to schedule witness interview
7/6/2017	AN	0.2	AN/JF Meet re potential trial witness outreach
7/6/2017	JF	0.3	Update the trial witness interview spreadsheet
7/6/2017	JF	1.6	Conduct potential trial witness interview
7/6/2017	JF	1.5	Conduct potential trial witness interview
7/6/2017	AN	0.1	Telephone call with regard to case
7/6/2017	JS	0.1	JS/JF Check-in re witness interview status

Date	Staff	Amount of Time	Description
7/6/2017	JF	0.1	JS/JF Check-in re witness interview status
7/6/2017	JF	0.8	Conduct outreach to schedule trial witness interviews
7/6/2017	MD	1.3	draft mediation statement 1.3
7/6/2017	JS	0.2	Email opt-in to reschedule trial witness phone call and to procure current phone number
7/6/2017	JS	0.1	Call to reschedule trial witness call
7/6/2017	JS	0.1	Send follow-up email due to inability to reach by phone, in order to schedule trial witness phone call.
7/7/2017	MD	1	draft outline for confidential mediator's eyes only statement
7/7/2017	JS	0.3	Generate list of additional opt-ins who need documents, email paras to ensure currency of work status
7/7/2017	JF	0.1	Call from opt-in to schedule a potential trial witness interview
7/7/2017	JS	0.2	Draft and send email with documents for opt-in review prior to trial witness evaluation phone call.
7/7/2017	MD	1	drafting mediation statement 1.0
7/7/2017	JS	0.1	Email documents for opt-in review prior to trial witness evaluation phone call
7/7/2017	JS	0.4	Assemble documents for opt-in review prior to trial witness evaluation phone call
7/7/2017	JF	3.1	Edit/review interview notes
7/7/2017	JS	0.4	Pre-fill interview template with information from Interrogatories, Itinerary information, any intake interviews of opt-in to maximize efficiency of interview call.
7/7/2017	JF	1.6	Conduct opt-in potential trial witness interview
7/7/2017	JS	0.5	Assemble documents for trial witness phone call for opt-in review prior to call
7/7/2017	JS	0.3	Assemble documents for opt-in review prior to trial witness phone call
7/7/2017	JF	0.1	Draft/send email to plaintiff re their updated contact information
7/7/2017	JF	0.3	Calculate variable labor hours for opt-in who worked as a Retail Sales Manager
7/7/2017	JS	0.1	Send documents to opt-in for review prior to trial witness evaluation phone call
7/7/2017	JF	0.1	Reach out to opt-in re scheduling of witness interview
7/7/2017	JS	0.5	Assemble documents for opt-in review prior to trial evaluation phone call
7/7/2017	JS	0.1	Email documents to opt-in for review prior to trial witness phone call
7/7/2017	JS	0.1	Send email to prior deponent re: Trial date and time.
7/9/2017	MR	7	Locate resource files for revised Plaintiff version calculations .7; Organize resource files .5; Create DetailSN class separate from opt-ins 2.0; Copy data from Def version to mediation version for sheet1 1.9 ; Optimize calculation sheets .6; Remove MI from equations on sheet1 .3.; Populate pled state and severance 1.0
7/9/2017	MR	2	Combine various new payroll datasets received in June from Kellogg 2.0
7/10/2017	MD	0.7	md/ms call with Local Counsel (Mike Subit) to gather details about mediator and trying cases before J. Leighton 0.7
7/10/2017	JS	0.4	Assemble and email documents for opt-in review prior to trial witness evaluation phone call.
7/10/2017	JF	0.3	Conduct brief conversation with opt-in re status of the case
7/10/2017	MS	0.3	md/ms digest conversation with Local Counsel and discuss how that impacts litigation strategy 0.3
7/10/2017	JS	0.5	Assemble and email documents for opt-in review prior to trial witness evaluation phone call.
7/10/2017	JF	0.1	MD/JF Discuss the task to draft email to named plaintiffs re upcoming mediation



Date	Staff	Amount of Time	Description
7/10/2017	JS	0.4	Assemble and email documents for opt-in review prior to trial witness evaluation phone call.
7/10/2017	JS	0.5	Assemble and email documents for opt-in review prior to trial witness evaluation phone call.
7/10/2017	MD	0.3	md/ms digest conversation with Local Counsel and discuss how that impacts litigation strategy 0.3
7/10/2017	JF	1.8	Conduct potential witness interview
7/10/2017	MD	0.1	MR provide MD status on damage calculations for mediation 0.1
7/10/2017	MR	0.1	MR provide MD status on damage calculations for mediation 0.1
7/10/2017	JS	0.5	Assemble and email documents for opt-in review prior to trial witness evaluation phone call.
7/10/2017	MD	0.1	MD/JF Discuss the task to draft email to named plaintiffs re upcoming mediation
7/10/2017	MR	4.5	Work on Morning Foods sheet 2.5; Pull TM codes and status for Plaintiffs calcs .6; Resolve tolling discrepancy on Defendant version .7; Correct Row 44 formula error for PTO reduction on Defendant version .5; Adjust interest to date on Defendant version .2
7/10/2017	JS	0.5	Assemble and send documents to opt-in for review prior to trial witness evaluation phone call
7/10/2017	JF	0.5	Prepare witness interview sheet for opt-in
7/10/2017	MS	0.7	md/ms call with Local Counsel (Mike Subit) to gather details about mediator and trying cases before J. Leighton 0.7
7/10/2017	JF	0.1	Call with opt-in to re-schedule trial witness interview
7/10/2017	JS	0.1	Respond to opt-in email asking for call scheduling confirmation
7/10/2017	JF	1.5	Conduct potential trial witness interview
7/11/2017	MD	0.3	md/mr discuss data needed from defense counsel re paycodes 0.3
7/11/2017	JF	1.3	Conduct opt-in witness interview
7/11/2017	JS	0.1	JS/JF discuss whether to schedule resurfaced opt-in (who had missed initial communication re: interviews)
7/11/2017	JF	0.1	MD/JF Attorney request to search for WA medium income/census data (for the purposes of upcoming mediation)
7/11/2017	MR	1.2	Create pay code list from new payroll data to email to Kellogg for clarification 1.2
7/11/2017	JS	0.4	Call to schedule trial witness evaluation
7/11/2017	JF	0.1	JS/JF discuss whether to schedule resurfaced opt-in (who had missed initial communication re: interviews)
7/11/2017	JF	0.2	Locate WA state median income data to be included in the mediation preparation package
7/11/2017	MD	0.1	MD/JF Attorney request to search for WA medium income/census data (for the purposes of upcoming mediation)
7/11/2017	MR	0.1	Read/reply to MD draft email
7/11/2017	JF	1.1	Conduct opt-in Interview
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JS	0.1	Call to bump interview by ~20 mins (technical issue)
7/11/2017	JS	0.4	Pre-fill witness interview sheet with existing information to ensure efficiency of information-gathering
7/11/2017	MD	1.5	draft mediation statement pursuant to Mediators' rules 1.5
7/11/2017	JS	1.6	Trial witness evaluation phone call
7/11/2017	MD	2	draft mediator's eyes only mediation statement 2.0

Date	Staff	Amount of Time	Description
7/11/2017	JS	0.2	Review opt-in email, forward to team with query whether we ought to schedule interview as trial witness
7/11/2017	JS	0.5	Assemble and email documents for opt-in review prior to trial witness evaluation phone call
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JF	0.2	Call with opt-in to schedule witness interview
7/11/2017	MD	0.2	email defense counsel re pay codes for settlement purposes 0.2
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JF	1.5	Conduct opt-in trial witness interview
7/11/2017	MR	0.3	md/mr discuss data needed from defense counsel re paycodes 0.3
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JF	0.1	Conduct brief follow up witness interview
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JS	0.4	Assemble and email documents for opt-in review prior to trial witness evaluation phone call
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JS	0.1	Draft and send email regarding mediation schedule and settlement authority--availability for call
7/11/2017	JS	0.5	Assemble and email documents for opt-in review prior to trial witness evaluation phone call
7/11/2017	JS	0.3	Pre-fill witness interview sheet with existing information to ensure efficiency of information-gathering
7/11/2017	JF	0.2	MD/JF Discuss upcoming mediation travel arrangements, outreach to named plaintiff
7/11/2017	JF	0.1	JS/JF Check-in re witness interview scheduling
7/11/2017	MD	0.2	MD/JF Discuss upcoming mediation travel arrangements, outreach to named plaintiff
7/11/2017	JF	0.2	Call with opt-in re case update
7/11/2017	JS	0.1	JS/JF Check-in re witness interview scheduling
7/12/2017	MD	2.5	draft mediation statement to exchange with Kellogg and mediator pursuant to mediator's request 2.5
7/12/2017	MD	0.2	MD/JF Discuss the documents needed for upcoming mediation
7/12/2017	JF	0.2	MD/JF Discuss the documents needed for upcoming mediation
7/12/2017	JF	1.4	Conduct trial witness interview
7/12/2017	MD	2	draft mediator's eyes only statement pursuant to mediator's request 2.0
7/12/2017	JK	0.3	jk Secure data for transport on laptop.
7/12/2017	JF	1.6	Conduct trial witness interview
7/12/2017	JS	1.4	Trial Witness Evaluation phone call
7/13/2017	JF	0.5	MD/JF Meet re trial witness selection

Date	Staff	Amount of Time	Description
7/13/2017	JF	0.1	JF/ME discuss scheduling times to interview additional potential trial witnesses
7/13/2017	ME	0.1	JF/ME discuss scheduling times to interview additional potential trial witnesses
7/13/2017	ME	0.7	review trial witness interview template to prepare for interviewing potential witnesses
7/13/2017	JF	0.3	ME/JF Check in re questions in anticipation of the potential trial witness interviews
			JF/ME evaluate potential trial witnesses per information gathered during interview .2; determine process for continuing trial witness interviews .1 discuss current status of case
7/13/2017	JF	0.4	.1
			MD/JF Check-in re tracking of missing personnel folder for opt-in considered to be a
7/13/2017	JF	0.1	potential trial witness
7/13/2017	JF	0.3	Prepare opt-in interview sheet
			JF/ME review trial witness interview questions for trial to prepare ME for interviewing
7/13/2017	JF	0.9	witnesses
7/13/2017	JS	0.1	JS/ME discuss process of interviewing witnesses for trial
			Correct damage calcs detail page totals .7; Begin work on summary page revisions 2.5; Work on extrapolation calcs 1.5; Populate job title and action type for SN opt-ins .9; Set severance equations .5; Compare plaintiff calculation version figures with defendant
7/13/2017	MR	10.8	version 1.2; Investigate and fix various discrepancies between def and plt versions 3.5
7/13/2017	ME	2.4	telephone call to interview opt-in as potential trial witness
			JF/ME evaluate potential trial witnesses per information gathered during interview .2; determine process for continuing trial witness interviews .1 discuss current status of case
7/13/2017	ME	0.4	.1
			MD/JF Check-in re tracking of missing personnel folder for opt-in considered to be a
7/13/2017	MD	0.1	potential trial witness
7/13/2017	ME	1.5	telephone call to interview opt-in as potential trial witness
7/13/2017	MD	0.5	MD/JF Meet re trial witness selection
			JF/ME review trial witness interview questions for trial to prepare ME for interviewing
7/13/2017	ME	0.9	witnesses
7/13/2017	ME	0.3	ME/JF Check in re questions in anticipation of the potential trial witness interviews
7/13/2017	ME	0.1	JS/ME discuss process of interviewing witnesses for trial
7/13/2017	JF	0.4	Prepare opt-in potential trial witness interview sheet
			Fix MN LD calculation on Def version of calcs .5; Remove MI state claims calculation on
7/14/2017	MR	5	Def version of calcs .5; Continue Work on Summary Sheet 4.0
7/14/2017	MD	0.1	JS/MD debrief after call with travel agency
7/14/2017	JS	0.5	JS/MD on call with Travel agent to discuss trial logistics and services
7/14/2017	JS	0.1	JS/MD debrief after call with travel agency
7/14/2017	MD	0.5	JS/MD on call with Travel agent to discuss trial logistics and services
7/14/2017	ME	0.4	edit trial witness interview notes to make them more easy to read
7/14/2017	ME	0.1	telephone call with opt-in to schedule time for trial witness interview
7/14/2017	MD	1	review witness interviews for trial selection 1.0
7/14/2017	ME	0.3	Pre-fill trial witness interview sheet to prepare for interview with opt-in
7/14/2017	JS	0.4	Assemble documents for opt-in review prior to trial witness evaluation call
7/14/2017	ME	0.8	telephone calls to opt-ins to schedule trial witness interviews
			telephone call with opt-in to schedule time for trial witness interview .1; notes from
7/14/2017	ME	0.2	conversation .1

Date	Staff	Amount of Time	Description
7/14/2017	ME	0.3	Pre-fill trial witness interview sheet to prepare for interview with opt-in
7/14/2017	ME	0.1	send emails to opt-ins to schedule trial witness interviews
7/14/2017	JS	1.5	Trial witness evaluation interview
7/14/2017	ME	0.4	edit trial witness interview notes to make them more easy to read
7/14/2017	ME	0.2	read case summary to prepare for witness trial interviews
7/14/2017	ME	0.3	Pre-fill trial witness interview sheet to prepare for interview with opt-in
7/14/2017	ME	0.3	Pre-fill trial witness interview sheet to prepare for interview with opt-in
7/14/2017	ME	0.2	edit trial witness interview notes to make them more easy to read
7/14/2017	ME	0.9	review previous trial witness interviews to prepare for upcoming interviews
7/14/2017	ME	0.6	telephone call with opt-in for trial witness interview
7/14/2017	ME	0.9	telephone call with opt-in to complete trial witness interview
			Revise extrapolation calcs to correct and to include FLSA week NY int and AZ LD for both Def and Plt versions 3.1; Create new Totals sheets 2.9; Revise extrapolations to include 3rd year FLSA and Relation Back adjustables .9; Continue work on Summary sheet 1.5 ;
7/16/2017	MR	9.5	Develop totals for discovery reps 1.1
7/17/2017	JF	0.1	JF/ME discuss setting up calls with named plaintiffs regarding mediation
7/17/2017	JF	0.7	JF/ME review best practices for interview potential trial witnesses
7/17/2017	ME	0.2	telephone call from opt-in for case update
7/17/2017	ME	0.7	JF/ME review best practices for interview potential trial witnesses
7/17/2017	ME	1.6	telephone call with opt-in to complete trial witness interview
7/17/2017	MS	1.4	review and revise mediation statement
7/17/2017	ME	0.1	JF/ME discuss setting up calls with named plaintiffs regarding mediation
			review trial witness interview forms to develop list of questions to review with JF to
7/17/2017	ME	0.8	improve interviewing skills
7/17/2017	ME	0.1	left voicemail for named plaintiff to call our office to discuss mediation
7/17/2017	ME	0.3	telephone call with named plaintiff about mediation
7/17/2017	ME	0.1	JF/ME discuss case update to opt-ins
			Correspond/schedule the timeframe for attorney discussion re settlement authority
7/17/2017	JF	1.1	needed from the named plaintiffs
7/17/2017	ME	0.1	left voicemail for plaintiff to call regarding mediation
7/17/2017	ME	1.4	telephone call with opt-in for trial witness interview
7/17/2017	ME	0.2	determine if we should proceed with trial witness interviews
7/17/2017	MR	3.1	Perform full analysis of RSM VL hours summary of data 3.1; email to team .1
7/17/2017	JF	0.1	JF/ME discuss case update to opt-ins
7/17/2017	MR	0.2	md/mr discuss status of damage calculation 0.2
7/17/2017	MD	0.2	md/mr discuss status of damage calculation 0.2
7/17/2017	ME	0.1	email JF about responding to opt-in inquiries for case updates
7/17/2017	CM	0.1	call from client re setting meeting to speak with attorney
7/17/2017	ME	0.2	telephone call with opt-in to cancel trial witness interview .2
			Finish plaintiff version of damages calcs for mediation 7.0, email to team with detailed
7/18/2017	MR	7.4	comments .4
7/18/2017	ME	0.3	review witness interviews to create summaries of impression of potential trial witnesses
7/18/2017	ME	0.1	telephone call with plaintiff to schedule time to speak with attorney regarding mediation
7/18/2017	JF	0.1	Call to plaintiff to schedule attorney settlement authority call (pre-mediation)
7/18/2017	ME	0.6	clean up notes from trial witness interview so they are easier to review
7/18/2017	JF	0.2	ME/JF Check-in re witness interviews selection process
7/18/2017	ME	0.2	email plaintiffs asking them to contact our office about mediation
7/18/2017	ME	0.4	clean up notes from trial witness interview so they are easier to review

Date	Staff	Amount of Time	Description
7/18/2017	MR	0.2	Fix size issue of Excel mediation damage calcs
7/18/2017	JF	0.1	Call to plaintiff to schedule attorney settlement authority call (pre-mediation)
7/18/2017	ME	0.5	clean up notes from trial witness interview so they are easier to review
7/18/2017	MD	2.5	edit mediation statements
7/18/2017	MD	0.4	md/ms discuss changes to mediation statement
7/18/2017	ME	0.2	ME/JF Check-in re witness interviews selection process
7/18/2017	MS	0.4	md/ms discuss changes to mediation statement
7/18/2017	ME	1	telephone call with opt-in to complete trial witness interview
7/18/2017	JF	0.1	Call with opt-in re case update
7/18/2017	ME	0.2	telephone call with plaintiff to schedule a time to speak with MD about mediation
7/19/2017	MR	1.4	Email detailed explanations to MS questions about damage calculations
7/19/2017	MR	0.1	Email note about mediation planning meeting to JK
7/19/2017	MA	2.2	finalizing mediation statements in order to file
7/19/2017	ME	0.5	finish drafting case update email to opt-ins
			Update Defendant version of damages to match current parameters of Plaintiffs damage
7/19/2017	MR	2.3	calcs
7/19/2017	JF	0.1	Leave VM to schedule settlement authority phone conversation with attorney
7/19/2017	JF	0.1	Leave VM to schedule settlement authority phone conversation with attorney
7/19/2017	MD	1.5	prepare and finalize mediation statement to exchange and submit to mediator 1.5
7/19/2017	MS	0.3	provide TM and RSR job duty charts for mediation statement
7/19/2017	MD	0.5	outline settlement moves 0.5
7/19/2017	MD	0.2	review plaintiffs internal damage calculations 0.2
7/20/2017	MS	1	md/ms confer re mediation strategy 1.0
			MS/MD/AD/JS/JF/MR (in part)/ME (in part) Pre-Mediation Assessment of Damages
7/20/2017	JF	2.5	Meeting
7/20/2017	MD	0.3	prepare for mediation meeting .3
7/20/2017	MD	1	md/ms confer re mediation strategy 1.0
7/20/2017	MD	0.2	read Kellogg's mediation statement 0.2
			MS/MD/AD/JS/JF/MR (in part)/ME (in part) Pre-Mediation Assessment of Damages
7/20/2017	MS	2.5	Meeting
7/20/2017	MD	0.5	call with client about approval for settlement authority for mediation 0.5
7/20/2017	JF	1.8	Print documents for MD to take to Kellogg mediation
7/20/2017	MR	2.1	Initial work on revisions to extend Extrapolation calcs
7/20/2017	MD	0.3	MD/JF Discuss the documents needed for mediation
7/20/2017	JF	0.3	MD/JF Discuss the documents needed for mediation
7/20/2017	JF	0.1	Re-send link to updated damages document to opposing counsel
7/20/2017	MD	0.1	MD/JF Request to re-send the updated damages document to opposing counsel
			MS/MD/AD/JS/JF/MR (in part)/ME (in part) Pre-Mediation Assessment of Damages
7/20/2017	JS	2.5	Meeting
			MS/MD/AD/JS/JF/MR (in part)/ME (in part) Pre-Mediation Assessment of Damages
7/20/2017	MD	2.5	Meeting
			MS/MD/AD/JS/JF/MR (in part)/ME (in part) Pre-Mediation Assessment of Damages
7/20/2017	AD	2.5	Meeting
7/20/2017	MD	0.4	call with client re settlement approval for mediation 0.4
			MS/MD/AD/JS/JF/MR (in part)/ME (in part) Pre-Mediation Assessment of Damages
7/20/2017	MR	2	Meeting

Date	Staff	Amount of Time	Description
7/20/2017	ME	0.4	MS/MD/AD/JS/JF/MR (in part)/ME (in part) Pre-Mediation Assessment of Damages Meeting
7/20/2017	JF	0.1	MD/JF Request to re-send the updated damages document to opposing counsel
7/21/2017	ME	1.6	search discovery for documents needed for mediation
7/21/2017	MR	0.3	mr/md confer re md computer needs for mediation 0.3
7/21/2017	JF	0.2	MA/JF MA to advise JF how to print a large scale excel spreadsheet (upcoming mediation)
7/21/2017	MD	0.5	prepare for calls with clients about mediation 0.5
7/21/2017	CLER	0.4	organize documents for attorney to take to mediation
7/21/2017	JF	0.2	JF/ME review documents to be compiled for mediation preparation
7/21/2017	MD	0.3	mr/md confer re md computer needs for mediation 0.3
7/21/2017	MA	0.2	MA/JF MA to advise JF how to print a large scale excel spreadsheet (upcoming mediation)
7/21/2017	MD	0.1	email defense counsel about plaintiffs who are outside of SOL for mediation purposes 0.1
7/21/2017	JF	3.1	Prepare materials to be taken down to upcoming case mediation (for MD)
7/21/2017	MD	0.3	call with client about settlement 0.3
7/21/2017	JF	0.1	MD/JF Meet re email from named plaintiff re accomodation request/inquiry
7/21/2017	ME	0.2	telephone call with opt-in regarding trial witness interview
7/21/2017	ME	0.1	JF/ME review status of the selection of potential trial witnesses
7/21/2017	DG	0.2	confer re strategy to resolve Rule 23 class claims 0.2
7/21/2017	JS	0.5	Assemble and send documents for opt-in review prior to trial.
7/21/2017	MD	0.3	call with client about approving settlement numbers for mediation 0.3
7/21/2017	ME	0.3	Search for specific discovery document needed for mediation
7/21/2017	JF	0.2	Draft email to named plaintiff re accomodation option for Kellogg mediation
7/21/2017	MD	0.1	MD/JF Meet re email from named plaintiff re accomodation request/inquiry
7/21/2017	MD	0.2	confer re strategy to resolve Rule 23 class claims 0.2
7/21/2017	ME	0.2	JF/ME review documents to be compiled for mediation preparation
7/21/2017	MD	0.3	call with client about settlement authority for mediation 0.3
7/21/2017	JF	0.1	JF/ME review status of the selection of potential trial witnesses
7/21/2017	MR	1	Start prep of laptop for MD to take to mediation conference
7/21/2017	MD	0.4	call with named plaintiff about providing settlement authority 0.4
7/21/2017	JF	0.1	JF/ME review status of the selection of potential trial witnesses
7/21/2017	MD	0.5	call with client to receive settlement authority for mediation 0.5
7/22/2017	MR	3	Work on updates to mediation damage calculations per Kellogg team conference Conrtinued work on updates to mediation damage calculations per Kellogg team
7/23/2017	MR	10.2	conference
7/24/2017	MD	0.7	prepare for mediation 0.7
7/24/2017	AG	0.2	AG/ME review process for booking hotel rooms
7/24/2017	ME	0.2	AG/ME review process for booking hotel rooms
7/24/2017	ME	0.2	contact plaintiff about mediation details
7/24/2017	MD	0.1	MD/ME delegate task of printing potential trial witness interviews for attorney review
7/24/2017	MD	0.4	confer with client re settlement authority 0.4
7/24/2017	ME	0.1	MD/ME delegate task of printing potential trial witness interviews for attorney review
7/24/2017	MR	1	Continue prep of laptops for use at mediation
7/24/2017	ME	1.1	research potential car services for plaintiff to attend mediation



Date	Staff	Amount of Time	Description
			Research documents for number of TMs employed by Kellogg at various dates .7;
7/24/2017	MR	1.2	Perform web research on TMs employed by Kellogg .5
7/24/2017	ME	0.1	telephone call to opt-in regarding case update
7/24/2017	ME	2.3	print potential trial witness interviews for attorney to review
7/24/2017	MD	0.3	confer with client re settlement 0.3
7/24/2017	MD	0.2	text client re settlement authority for case 0.2
7/24/2017	MR	1.3	md/mr review damage calculations for mediation 1.3
7/24/2017	ME	0.1	MD/ME discuss plaintiff's accommodations for mediation
7/24/2017	MD	0.1	MD/ME discuss plaintiff's accommodations for mediation
7/24/2017	ME	1.1	research hotel accommodations for plaintiff during mediation
7/24/2017	MD	1.3	md/mr review damage calculations for mediation 1.3
			md/mr/dg strategize re settlement strategies to deal with Rule 23 and FLSA clasims for
7/24/2017	MR	0.5	passive class members 0.5
7/24/2017	CLER	0.3	organize documents for attorney to take to mediation
			md/mr/dg strategize re settlement strategies to deal with Rule 23 and FLSA clasims for
7/24/2017	MD	0.5	passive class members 0.5
			md/mr/dg strategize re settlement strategies to deal with Rule 23 and FLSA clasims for
7/24/2017	DG	0.5	passive class members 0.5
7/25/2017	MR	2.5	Start work on analysis of new payroll data for measurement of PTO time 2.5
			Complete work on analysis of new payroll data for measurement of PTO time 2.2; Email
7/25/2017	MR	2.4	detailed explanation of analysis to MD .2
			travel to Seattle from NYC for mediation 10.0 (work on plane for 4.0 hours for mediation
7/25/2017	MD	10	prep)
7/25/2017	ME	0.1	email hotel receipt to CM for accounting purposes
7/25/2017	ME	0.3	search for any additional documents that might be needed for mediation
7/25/2017	MD	1	review and gather documents for mediation 1.0
7/26/2017	MR	0.9	Research Kellogg SEC filings regarding mention of litigations
7/26/2017	MD	0.5	meet with client before mediation 0.5
			Work on report as to numbers regarding the overlapped weeks correction 1.0; work on
			report as to numbers for the additional weeks correction (from 6/9/2017 to 8/18/2017)
7/26/2017	MR	2.5	1.5
7/26/2017	MD	0.2	walk to mediation location from local counsel's office 0.2
7/26/2017	MD	0.8	meet with local counsel and client before start of mediation 0.8
7/26/2017	MD	1	digest mediation results with client and local counsel 1.0
7/26/2017	MD	8.5	attend mediation 8.5
			Work on report as to changes to full damages from Defendant's more recent version .5;
7/26/2017	MR	1.4	Create detail sheet of changes to damages .9
7/26/2017	JF	0.2	MR/JF Discuss the settlement negotiations process during mediation
7/26/2017	MR	0.1	Reply to email from MD question about analysis of damages
7/26/2017	ME	1	search for calendars produced by opt-ins for use at mediation
			Research opt-in documents re hours worked (calendars) in Morning Foods division of
7/26/2017	JF	0.6	Kellogg (mediation)
			ME/JF Discuss additional evidence requested by MD for the purposes of mediation (hours
7/26/2017	JF	0.2	worked in Morning Foods division of Kellogg)
			Send reply and follow-up reply to email question from MD about FLSA damages since last
7/26/2017	MR	1.1	mediation
7/26/2017	ME	0.1	telephone call from opt-in for case update

Date	Staff	Amount of Time	Description
7/26/2017	ME	0.2	ME/JF Discuss additional evidence requested by MD for the purposes of mediation (hours worked in Morning Foods division of Kellogg)
7/27/2017	MD	10	travel return from mediation 10.
7/27/2017	MD	0.5	provide team update on mediation 0.5
7/27/2017	JS	0.2	Email update on mediation
7/28/2017	JF	0.2	Draft letter to named plaintiffs to inform them of the mediation results
7/28/2017	JF	0.2	Call with opt-in re mediation update
7/28/2017	MD	0.3	type up notes on mediation for MS 0.3
7/28/2017	JF	0.2	Send email to named plaintiffs in the case re the mediation update/status
7/28/2017	ME	0.2	ME/JF Discuss the task to further refine client data available for potential opt-in trial witnesses
7/28/2017	MD	0.5	MD/JF Meet re the process to notify the selected opt-ins to be witnesses at the upcoming trial
7/28/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#438 REPORT from Mediator James A. Smith)
7/28/2017	JF	0.4	Draft email to named plaintiffs re mediation update
7/28/2017	JF	0.8	Draft email to be sent to prospective selected opt-in trial witnesses (trial preparation)
7/28/2017	JF	0.5	MD/JF Meet re the process to notify the selected opt-ins to be witnesses at the upcoming trial
7/28/2017	JS	0.2	Contact information update
7/28/2017	JF	0.2	ME/JF Discuss the task to further refine client data available for potential opt-in trial witnesses
7/31/2017	MS	0.2	ms/mr discuss adjusting damages based on issues raised in mediation
7/31/2017	JF	0.2	Call with plaintiff re case update (post-mediation)
7/31/2017	JF	0.9	Prepare email to be sent to all the potential witnesses to make sure they are on notice to testify
7/31/2017	MR	0.3	MR/JF Discuss the tasks to: 1. review the Kellogg data for the purposes of preparing for trial (personnel file data, start/term date, DOB, gender) 0.2; 2. help assist the Analytics department with potential missing gaps in the Defendants' employment data 0.1
7/31/2017	JS	0.3	Proofread and edit letter to mediator regarding clarification of Kellogg's position.
7/31/2017	MS	0.4	discussion of mediation strategy with M Subit
7/31/2017	MS	1.6	drafting follow up letter to mediator
7/31/2017	ME	0.2	ME/JF Catch-up re workload (time for potential Kellogg task re documents/trial witness review)
7/31/2017	JF	0.5	Reply to responses re the participation in the trial
7/31/2017	MR	0.2	ms/mr discuss adjusting damages based on issues raised in mediation
7/31/2017	JF	0.2	Call with plaintiff re case update (post-mediation)
7/31/2017	MS	0.3	review mediation notes and draft letter to J Smith, mediator
7/31/2017	JF	0.3	MR/JF Discuss the tasks to: 1. review the Kellogg data for the purposes of preparing for trial (personnel file data, start/term date, DOB, gender) 0.2; 2. help assist the Analytics department with potential missing gaps in the Defendants' employment data 0.1
7/31/2017	JF	0.2	ME/JF Catch-up re workload (time for potential Kellogg task re documents/trial witness review)
7/31/2017	MS	0.1	email to M Subit re mediation letter
8/1/2017	JF	0.3	Call with opt-in re case update
8/1/2017	JF	0.2	Call with plaintiff re case update

Date	Staff	Amount of Time	Description
8/1/2017	JF	0.1	Reach out to plaintiff re case update
8/1/2017	MR	0.1	MR/JF Check-in re reception of an undeliverable email recipient (email malfunction)
8/1/2017	JF	0.1	MR/JF Check-in re reception of an undeliverable email recipient (email malfunction)
8/2/2017	ME	0.3	begin process of verifying that all PLT witness documents are compiled to prepare for trial
8/2/2017	ME	0.3	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/2/2017	JF	0.2	Call with plaintiff re case update
8/2/2017	ME	0.6	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/2/2017	JF	0.2	ME/JF Discuss the task to check the completeness of client folders in order to begin the necessary trial preparations
8/2/2017	ME	0.8	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/2/2017	ME	0.2	ME/JF Discuss the task to check the completeness of client folders in order to begin the necessary trial preparations
8/2/2017	ME	0.1	JF/ME decide upon organization of trial witness document folders
8/2/2017	JF	0.1	JF/ME decide upon organization of trial witness document folders
8/3/2017	JF	0.2	Call with opt-in re case update
8/3/2017	JF	0.6	Call with a current Kellogg opt-in re post-mediation case update
8/4/2017	ME	0.1	JF/ME discuss email about opt-in's bankruptcy
8/4/2017	ME	0.6	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/4/2017	MS	0.3	reviewing Court JEEP and judge rules for trial
8/4/2017	ME	0.2	review case related information sent by opt-in
8/4/2017	JF	0.2	Call from opt-in re case update
8/4/2017	JF	0.1	JF/ME discuss email about opt-in's bankruptcy
8/7/2017	MS	1.1	develop exhibit list outline
8/7/2017	JF	0.3	Compose an email to MS re my position on the question of hours worked for plaintiffs/trial preparation
8/7/2017	ME	0.2	telephone call from intake interested in joining the case
8/7/2017	ME	0.1	telephone call from opt-in for case update
8/7/2017	ME	0.4	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/7/2017	ME	0.2	ME/JF Check-in re outcome of the research re hours worked in Morning Foods division of Kellogg project
8/7/2017	JF	0.1	Respond to opt-in re trial
8/7/2017	MS	0.2	MS/JF Check-in re potential project of collecting declarations from plaintiffs who have worked in the MF division of Kellogg/trial preparation
8/7/2017	JF	0.2	MS/JF Check-in re potential project of collecting declarations from plaintiffs who have worked in the MF division of Kellogg/trial preparation
8/7/2017	MS	0.1	MS/JF Check-in re plaintiffs keeping track of hours worked in the Morning Foods Division of Kellogg/trial preparation
8/7/2017	JF	0.2	ME/JF Discuss the itinerary review project in preparation for the trial
8/7/2017	JF	0.3	ME/JF Discuss potential upcoming paralegal projects to be completed prior to trial
8/7/2017	ME	0.2	ME/JF Discuss the itinerary review project in preparation for the trial

Date	Staff	Amount of Time	Description
8/7/2017	JF	0.2	ME/JF Check-in re outcome of the research re hours worked in Morning Foods division of Kellogg project
8/7/2017	ME	0.3	ME/JF Discuss potential upcoming paralegal projects to be completed prior to trial
8/7/2017	ME	2.5	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/7/2017	ME	0.3	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/7/2017	JF	0.1	MS/JF Check-in re plaintiffs keeping track of hours worked in the Morning Foods Division of Kellogg/trial preparation
8/7/2017	JF	0.2	Call from potential opt-in re interest in the case (opt-in not eligible)
8/8/2017	ME	0.9	continue process of verifying that all PLT witness documents are compiled to prepare for trial
8/8/2017	ME	0.2	MS/ME review process for creating trial exhibit list
8/8/2017	MS	0.2	MS/ME review process for creating trial exhibit list
8/8/2017	JF	0.2	Call for case update
8/8/2017	MS	0.1	MS/JF Discuss the task to assemble exhibits in preparation for the trial
8/8/2017	JF	0.7	Cross-check the project of assembling hours worked in the Morning Foods division of Kellogg from opt-in testimony
8/8/2017	ME	0.1	ME/JF Discuss the status of the potential opt-in outreach in the new case
8/8/2017	JF	0.1	MS/JF Discuss the task to assemble exhibits in preparation for the trial
8/8/2017	JF	0.1	ME/JF Discuss the status of the potential opt-in outreach in the new case
8/8/2017	MR	6.1	Sorted and coded combined dates of 16.15.1.7 damage calcs and extrapolations 1.0; Created table of first and last date of employment .5; Create script to create report of employment periods per opt-ins per dept per state 1.5; Perform fuzzy logic matchup to pull employee id info into JF's witness prep sheet 1.9;. Pull employment date info into JF's witness prep sheet 1.2
8/8/2017	MS	0.4	design process for exhibit list
8/9/2017	MS	1.3	developing exhibit list for proving hours
8/9/2017	ME	1.7	pull exhibits from plaintiffs' summary judgment opposition brief to begin compiling trial exhibits
8/10/2017	JF	0.1	Reach out to plaintiff re case update
8/10/2017	JF	0.1	Respond to MA re outreach to Kellogg plaintiff (status update)
8/10/2017	ME	0.4	pull list of exhibits from plaintiffs' summary judgment brief to begin compiling trial exhibits
8/10/2017	ME	1.5	pull exhibits from plaintiffs' summary judgment opposition brief to begin compiling trial exhibits
8/10/2017	ME	0.3	pull list of exhibits from plaintiffs' summary judgment reply brief to begin compiling trial exhibits
8/10/2017	ME	0.5	pull exhibits from plaintiffs' summary judgment opposition brief to begin compiling trial exhibits
8/10/2017	ME	0.9	pull list of exhibits from plaintiffs' summary judgment brief to begin compiling trial exhibits
8/11/2017	ME	0.2	MS/ME determine best practice for compiling potential trial exhibits
8/11/2017	ME	0.8	verify all exhibits from plaintiff's opposition to Kellogg's summary judgment motion have been compiled to prepare trial exhibits
8/11/2017	JF	0.3	MR/JF Discuss the project to extract specific demographic information from client documents of selected trial witnesses in preparation for the case trial proceedings
8/11/2017	JF	0.1	Call to opt-in re case update

Date	Staff	Amount of Time	Description
8/11/2017	CLER	0.3	Data Entry of contact information .10 Prepare welcome ltr to new client .20
8/11/2017	ME	0.3	begin compiling potential trial exhibits
8/11/2017	MS	1.6	review Bussell deposition for trial designation
8/11/2017	MS	0.2	MS/ME determine best practice for compiling potential trial exhibits
8/11/2017	MR	0.3	MR/JF Discuss the project to extract specific demographic information from client documents of selected trial witnesses in preparation for the case trial proceedings
8/11/2017	MS	2.1	designing depo testimony analysis for trial
8/11/2017	ME	0.6	begin comparing exhibit lists from Plaintiffs' summary judgment motion, Plaintiffs' opposition to Kellogg's SJ motion, and Plaintiffs' reply ISO motion for summary judgment to ensure there are no duplicative exhibits for the trial exhibit list
8/14/2017	MS	2.4	developing initial draft outline for evidence presentation at trial
8/14/2017	AG	0.4	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/14/2017	MS	0.2	md/ms discuss developing an outline for evidence presentation at trial
8/14/2017	MR	3.2	Work on project to identify weeks in common in damage calc extrapolations and June 2017 payroll 3.2
8/14/2017	JF	0.1	Respond to email from opt-in
8/14/2017	JF	0.1	MD/JF Check-in re status of the case (preparation for the trial status)
8/14/2017	ME	2.9	compile possible trial exhibits .6; compare exhibits from summary judgment briefings to ensure there are no duplicates 2.3
8/14/2017	MD	0.1	MD/JF Check-in re status of the case (preparation for the trial status)
8/14/2017	MD	0.3	review MS trial outline 0.3
8/14/2017	MS	0.2	md/ms discuss developing an outline for evidence presentation at trial
8/14/2017	JF	0.1	Renew/update Greenberg Traurig secure file transfer account
8/14/2017	MD	0.2	md/ms discuss developing an outline for evidence presentation at trial
8/14/2017	MD	0.2	md/ms discuss mediation
8/15/2017	ME	1.1	continue to work on making sure trial witness folders are complete
8/15/2017	MS	0.4	begin review of Groulx depo for trial designation and evidence
8/15/2017	MS	0.3	finishing Dombkiewicz testimony depo review
8/15/2017	CLER	0.3	Data Entry of contact information .10 Prepare welcome ltr to new client .20
8/15/2017	AG	0.1	ECF Filing of NOTICE of Filing of Consent to Joinder
8/15/2017	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
8/15/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#22 - NOTICE of Filing of Consent to Joinder)
8/16/2017	MS	0.1	MS/JF Check-in re signing of the new severance agreement requirement for the Kellogg/Thomas plaintiffs
8/16/2017	MS	0.9	digesting Groulx depo for trial testimony and exhibit list
8/16/2017	JF	0.1	MS/JF Check-in re signing of the new severance agreement requirement for the Kellogg/Thomas plaintiffs
8/16/2017	ME	1.5	continue to work on making sure trial witness folders are complete
8/16/2017	ME	0.5	continue to work on making sure trial witness folders are complete
8/16/2017	MD	3.5	drafting jury instructions 3.5
8/16/2017	CLER	0.3	Transfer documents recd from ECF system to docket file and create file copy (Docket#110 - Jury Instructions, 79 Joint Proposed Jury Instructions, 78Proposed Jury Instructions, 72 Proposed Jury Instructions)
8/16/2017	JF	0.1	Leave voicemail for opt-in re his webpage inquiry
8/16/2017	ME	0.4	continue to work on making sure trial witness folders are complete

Date	Staff	Amount of Time	Description
8/17/2017	MR	3.4	Continue to work on project to identify weeks in common in damage calc extrapolations and June 2017 payroll 3.0; Email detailed write-up of project to team .4
8/17/2017	MD	0.1	MD/JF Discuss call from the opt-in re Kellogg's new severance agreement
8/17/2017	ME	0.6	continue to work on making sure trial witness folders are complete
8/17/2017	JF	0.2	MS/JF Compare two severance agreements disseminated to opt-ins
8/17/2017	MD	4	draft jury instructions 4.0
8/17/2017	JF	0.2	Call with opt-in re new severance agreement
8/17/2017	JF	0.1	MD/JF Discuss call from the opt-in re Kellogg's new severance agreement
8/17/2017	MD	0.2	review MR work on extrapolation data for damage calculations 0.2
8/17/2017	MD	0.1	listen to voicemail from client about severance agreement 0.1
8/17/2017	MS	0.2	MS/JF Compare two severance agreements disseminated to opt-ins
8/17/2017	ME	0.4	continue to work on making sure trial witness folders are complete
8/17/2017	MR	0.1	Read/reply to MD email about substantiating extrapolation weeks
8/17/2017	ME	0.5	continue to work on making sure trial witness folders are complete
8/17/2017	JF	0.1	Draft email re dissemination of the new severance agreement to team
8/17/2017	CLER	0.1	create PDF format of document recd from client (Separation Agreement and General Release)
8/17/2017	ME	0.5	continue to work on making sure trial witness folders are complete
8/17/2017	MD	0.1	MD/JF Check-in re the status of preparation for the trial
8/17/2017	JF	0.1	MD/JF Check-in re the status of preparation for the trial
8/17/2017	ME	2.1	continue to work on making sure trial witness folders are complete
8/17/2017	ME	1.1	continue to work on making sure trial witness folders are complete
8/18/2017	JF	0.1	MD/JF Meet to review the next steps in the witness preparation process
8/18/2017	MD	0.1	MD/JF Meet to review the next steps in the witness preparation process
8/18/2017	ME	0.1	JF/ME delegate task of checking trial witness folders to be sure there are complete personnel folders for each person and to document DOB and race if that information is available
8/18/2017	MD	0.3	JS/MD meet to discuss travel arrangements and logistics for trial
8/18/2017	JF	0.2	ME/JF Discuss the status of the itineraries and client folder review (trial preparation)
8/18/2017	ME	0.2	ME/JF Discuss the status of the itineraries and client folder review (trial preparation)
8/18/2017	ME	0.4	complete the compilation of trial witness document folders
8/18/2017	JS	0.3	JS/MD meet to discuss travel arrangements and logistics for trial
8/18/2017	ME	2.4	verify whether or not defendants have produced an itinerary that correlates to each potential trial witnesses' territory
8/18/2017	AG	0.2	Registered JFriday for Webinar (Understand key strategies)
8/18/2017	ME	1.1	continue to compile documents to use as potential trial exhibits
8/18/2017	MR	3.2	Pull FLSA limit date into list of Opt-in extrapolation weeks within FLSA period 1.6; Create report of FLSA Opt-in extrapolation weeks 1.5; Send report to atty MD for presentation to Kellogg .1
8/21/2017	MD	0.5	md/ms confer about jury instructions for trial 0.5
8/21/2017	MS	0.5	md/ms confer about jury instructions for trial 0.5
8/21/2017	ME	1.3	begin to review documents produced by defense counsel for trial witnesses to determine who is missing personnel information
8/21/2017	JF	0.1	ME/JF Review the task of cross-checking the data compiled for attorney review re chosen trial witnesses
8/21/2017	JS	0.1	JS/MD jointly ascertain where files are located, develop plan to produce hardcopies.



Date	Staff	Amount of Time	Description
8/21/2017	ME	0.2	ME/JF Discuss the review of itineraries project
			Read/edit draft email to Defense Counsel regarding missing data for opt-in extrapolated
8/21/2017	MR	0.1	weeks
8/21/2017	JS	0.2	Locate and print witness testimony order files.
8/21/2017	MS	0.5	research on FLSA jury instructions including emails to potential sources
8/21/2017	JF	0.2	Call from opt-in re severance agreement
8/21/2017	CLER	0.3	Data Entry of contact information .10 Prepare welcome ltr to new client .20
8/21/2017	MS	1	review and revise preliminary and final jury instructions
			MD/JF Discuss the tasks needed to be accomplished by the end of this week (trial
8/21/2017	MD	0.4	preparation)
8/21/2017	JF	0.2	ME/JF Discuss the review of itineraries project
8/21/2017	MR	0.5	Incorporate age into witness status sheet .5
			MD/JF Discuss the tasks needed to be accomplished by the end of this week (trial
8/21/2017	JF	0.4	preparation)
			MS/MD[in part]/ME determine best process for organizing exhibits from summary
8/21/2017	MS	0.7	judgment filings to assist with selecting trial exhibits
			JF/ME discuss process of review trial witness folders to verify who does not have a
8/21/2017	JF	0.1	complete personnel folder
			MS/MD[in part]/ME determine best process for organizing exhibits from summary
8/21/2017	MD	0.3	judgment filings to assist with selecting trial exhibits
8/21/2017	MS	1	drafting introduction to motion for injunctive relief
8/21/2017	MD	0.1	email with mediator to schedule follow up call 0.1
			work on organizing exhibits by argument for attorneys to review to assist with trial
8/21/2017	ME	0.9	preparation
8/21/2017	MD	0.3	review jury instructions for other attorneys 0.3
8/21/2017	JF	0.1	Call with deponent re trial attendance
			ME/JF Review the task of cross-checking the data compiled for attorney review re chosen
8/21/2017	ME	0.1	trial witnesses
8/21/2017	MD	3.5	review witness interviews/testify for trial 3.5
			Compile additional personnel unique identifiers (age, race, gender) in order to begin the
8/21/2017	JF	1.2	review of ranking/order of trial witnesses
8/21/2017	MD	0.1	JS/MD jointly ascertain where files are located, develop plan to produce hardcopies.
			Create spreadsheet based on criteria articulated by attorney, print for review and
8/21/2017	JS	0.2	reference.
8/21/2017	MD	0.2	review updated witness list 0.2
			JF/ME discuss process of review trial witness folders to verify who does not have a
8/21/2017	ME	0.1	complete personnel folder
8/21/2017	JF	0.2	Call with opt-in re case update
			work on organizing exhibits by argument for attorneys to review to assist with trial
8/21/2017	ME	1.8	preparation
8/21/2017	MD	0.2	email defense counsel about missing pay data 0.2
			work on organizing exhibits by argument for attorneys to review to assist with trial
8/21/2017	ME	0.9	preparation
8/21/2017	MD	0.1	email local counsel re jury instructions 0.1
			MS/MD[in part]/ME determine best process for organizing exhibits from summary
8/21/2017	ME	0.7	judgment filings to assist with selecting trial exhibits
8/22/2017	MR	0.3	Correct report of extrapolated weeks of missing pay data .3
8/22/2017	ME	0.2	email work done on trial exhibit preparation to litigation team

Date	Staff	Amount of Time	Description
			create spreadsheet of exhibits used during summary judgment briefing and
8/22/2017	ME	2.3	corresponding arguments to assist attorneys with trial preparation
8/22/2017	MD	0.3	call with client about attending trial 0.3
8/22/2017	MR	0.2	Retrieve interview file inadvertently deleted by JF
8/22/2017	MS	0.4	MD/MS confer on strategy for trial witness order and testimony
8/22/2017	MD	0.3	call with client about severance agreement and impact on claims 0.3
8/22/2017	MD	1.5	review witnesses for trial 1.5
8/22/2017	MD	0.2	prepare for call with mediator 0.2
			update spreadsheet of exhibits used during summary judgment briefing and
8/22/2017	ME	1.9	corresponding arguments to assist attorneys with trial preparation
			work on organizing exhibits by argument for attorneys to review to assist with trial
8/22/2017	ME	0.3	preparation
8/22/2017	MR	0.1	Read/reply to email forwarded by MD regarding missing pay data
			format word documents from summary judgment filings so that citations for each
8/22/2017	ME	0.6	argument can be easily accessed
8/22/2017	MS	1.2	MD/MS conference call with mediator Smith
8/22/2017	JF	0.2	Call with opt-in re second round of severance agreements
8/22/2017	MD	0.1	MD/JF Brief check-in re fielding call and inquiries from the opt-ins process
8/22/2017	MS	0.2	MD/MS debrief with M Subit local counsel post conference call with mediator Smith
8/22/2017	MS	0.3	MD/MS develop settlement strategy post conference call with mediator Smith
8/22/2017	MD	0.4	MD/MS confer on strategy for trial witness order and testimony
8/22/2017	MD	0.2	confer with MR re Kellogg's response to extrapolation data 0.2
8/22/2017	JF	0.1	MD/JF Brief check-in re fielding call and inquiries from the opt-ins process
8/22/2017	MD	0.7	review witnesses interviews for trial testimony 0.7
8/22/2017	MR	0.2	confer with MR re Kellogg's response to extrapolation data 0.2
8/22/2017	MD	1.2	MD/MS conference call with mediator Smith
8/22/2017	MD	0.3	MD/MS develop settlement strategy post conference call with mediator Smith
8/22/2017	MD	0.2	MD/MS debrief with M Subit local counsel post conference call with mediator Smith
8/22/2017	ME	0.1	telephone call from opt-in for case update
			verify dates of trial witness itineraries are aligned with dates of employment within that
8/23/2017	ME	1.3	territory
			verify dates of trial witness itineraries are aligned with dates of employment within that
8/23/2017	ME	0.2	territory
8/24/2017	ME	0.1	email JF about the reorganization of trial folder
			verify dates of trial witness itineraries are aligned with dates of employment within that
8/24/2017	ME	1.3	territory
			Review/edit the mediation letter to be sent out to mediator/opposing counsel (per MD's
8/24/2017	JF	1.2	request)
			Research closest hotels and AirBnBs to Tacoma Courthouse, in preparation for travel and
8/24/2017	JS	1.3	logistics planning
8/24/2017	MS	0.3	md/ms confer re response to mediator J. Smith for counteroffer 0.3
8/24/2017	ME	0.1	leave voicemail for opt-in to return call about CTS
8/24/2017	MD	0.3	md/ms confer re response to mediator J. Smith for counteroffer 0.3
8/24/2017	MD	1.5	draft letter to mediation with plaintiffs' counter-offer 1.5
			verify dates of trial witness itineraries are aligned with dates of employment within that
8/24/2017	ME	0.4	territory
			verify dates of trial witness itineraries are aligned with dates of employment within that
8/25/2017	ME	0.3	territory

Date	Staff	Amount of Time	Description
8/25/2017	JF	0.2	Process the newly received copy of the severance agreement
8/25/2017	JF	0.1	JF/ME plan meeting to review project of identifying incomplete personnel folders for trial witnesses
8/25/2017	JF	0.3	Call with opt-in re concern about severance and its effect on the settlement value
8/25/2017	ME	0.9	verify dates of trial witness itineraries are aligned with dates of employment within that territory
8/25/2017	ME	0.1	JF/ME plan meeting to review project of identifying incomplete personnel folders for trial witnesses
8/25/2017	ME	0.6	verify dates of trial witness itineraries are aligned with dates of employment within that territory
8/25/2017	ME	0.7	begin creating index of trial witnesses' personnel folders in order to determine any missing discovery documents
8/25/2017	MS	0.3	call with Plaintiff considering opting out for fear of retaliation
8/28/2017	JF	2.1	Review/re-organize the trial folder (Selected witness folder)
8/28/2017	ME	0.9	inventory potential trial witness documents sent by opposing counsel during discovery to assist attorneys with trial preparation
8/28/2017	ME	0.3	compile trial witness folders for newly selected potential trial witnesses
8/28/2017	ME	0.2	inventory potential trial witness documents sent by opposing counsel during discovery to assist attorneys with trial preparation
8/28/2017	ME	0.4	assist attorneys with trial preparation
8/29/2017	AN	0.2	organize trial witness itineraries to assist attorneys with trial preparation
8/29/2017	ME	0.7	Telephone call regarding case
8/29/2017	ME	0.3	organize trial witness itineraries to assist attorneys with trial preparation
8/29/2017	ME	3.8	review witness interview forms to provide feedback about their potentiality to be a trial witness
8/29/2017	JF	0.2	Re-organize the Kellogg Trial subfolder
8/29/2017	JF	0.2	Call with opt-in re case/mediation update
8/29/2017	JF	0.2	ME/JF Check-in re the project of assembling itineraries into selected witness document folders (trial preparations)
8/29/2017	JF	0.1	ME/JF Discuss the task to review the interview notes for 2 selected witnesses
8/29/2017	ME	0.1	ME/JF Re-group on the questions re the review of 2 specific selected witness interview notes
8/29/2017	ME	0.2	ME/JF Check-in re the project of assembling itineraries into selected witness document folders (trial preparations)
8/29/2017	JF	0.1	ME/JF Re-group on the questions re the review of 2 specific selected witness interview notes
8/29/2017	MD	0.1	ME/JF Discuss the task to review the interview notes for 2 selected witnesses
8/29/2017	MS	0.3	respond to mediator request for written demand
8/29/2017	JS	0.2	JS/JF Discuss the process of eliminating "ghost" files from case folder
8/29/2017	ME	0.1	email JF response to question about thoughts on opt-in's potential as a trial witness
8/29/2017	JF	0.2	JS/JF Discuss the process of eliminating "ghost" files from case folder
8/29/2017	ME	0.4	organize trial witness itineraries to assist attorneys with trial preparation
8/30/2017	ME	0.5	read Defendants' Rule 26(a)(2) Expert Disclosures
8/30/2017	MS	0.4	review Dr. Loftus expert report
8/30/2017	MS	0.4	review Dr. Speakman expert report
8/30/2017	MS	0.6	research on memory research to evaluate Dr. Loftus testimony
8/30/2017	ME	0.1	ME/JF Discuss the ideal location for filing a document sent from opposing counsel re expert witness testimony
8/30/2017	ME	0.3	search defendants' production of emails for potential trial exhibits

Date	Staff	Amount of Time	Description
8/30/2017	JF	1.8	Review interview notes for selected witnesses
			ME/JF Discuss the ideal location for filing a document sent from opposing counsel re
8/30/2017	JF	0.1	expert witness testimony
8/30/2017	JF	2.3	Re-organize/clean/review trial folder in preparation for the trial
8/30/2017	JF	0.2	Save Defendants' proposed expert testimony motion in case folder (per MD's instruction)
8/30/2017	MS	0.2	email to ET re Kellogg's expert testimony
8/30/2017	MS	0.4	drafting memo on strategy for Dr. Speakman testimony
			legal research on standard for evidence establishing a just and reasonable inference to
8/30/2017	MS	0.8	address Dr. Speakman testimony
8/30/2017	ME	0.1	email response to opt-in requesting case update
			legal research on standard for evidence under Mt. Clemens burden shifting and how it
8/30/2017	MS	0.7	applies to Dr. Loftus testimony
8/31/2017	JS	0.5	Refine notes on call with travel agency for circulation to litigation team.
8/31/2017	MD	0.5	prepare for team meeting 0.5
8/31/2017	MD	0.3	review JF work on witness data for trial 0.3
8/31/2017	JF	0.1	Call with opt-in re severance agreement
			MD/AD/MS/JS/JK/JF/ME litigation team meeting to discuss trial preparation tasks and
8/31/2017	ME	0.7	process
8/31/2017	MD	0.7	md/ms confer re next steps for trial prep 0.7
8/31/2017	MS	0.4	md/ms discuss Kellogg's expert reports 0.4
8/31/2017	MS	0.7	md/ms confer re next steps for trial prep 0.7
8/31/2017	MD	0.4	md/ms discuss Kellogg's expert reports 0.4
8/31/2017	MD	0.4	MD/JF Discuss reorganization of the witness case folder
			MD/AD/MS/JS/JK/JF/ME litigation team meeting to discuss trial preparation tasks and
8/31/2017	JK	0.7	process
			MD/AD/MS/JS/JK/JF/ME litigation team meeting to discuss trial preparation tasks and
8/31/2017	JS	0.7	process
			MD/AD/MS/JS/JK/JF/ME litigation team meeting to discuss trial preparation tasks and
8/31/2017	AD	0.7	process
			MD/AD/MS/JS/JK/JF/ME litigation team meeting to discuss trial preparation tasks and
8/31/2017	MS	0.7	process
			MD/AD/MS/JS/JK/JF/ME litigation team meeting to discuss trial preparation tasks and
8/31/2017	MD	0.7	process
8/31/2017	JF	0.1	Call to opt-in re his email inquiry re severance
			MD/AD/MS/JS/JK/JF/ME litigation team meeting to discuss trial preparation tasks and
8/31/2017	JF	0.7	process
8/31/2017	JS	0.7	Review travel information; search Airbnb for possible "home bases" for trial.
8/31/2017	ME	0.6	review potential trial exhibits to bring to attorney attention at team meeting
8/31/2017	JF	0.4	MD/JF Discuss reorganization of the witness case folder
8/31/2017	ME	0.2	create summary of trial witness documents to present at team meeting
8/31/2017	JF	0.6	Review interview notes for selected witnesses
8/31/2017	ME	0.1	left voicemail for opt-in regarding newly received consent to sue
9/1/2017	MS	0.3	call with mediator about clarifying plaintiffs' demand 0.3
9/1/2017	MD	0.7	md/ms call with ET re strategy to deal with Kellogg's expert reports 0.7
9/1/2017	MD	0.2	email exchange with local counsel re trial prep call 0.2
9/1/2017	ME	0.1	review trial to do list spreadsheet
9/1/2017	MD	1	read witness interviews 1.0
9/1/2017	MS	0.7	md/ms call with ET re strategy to deal with Kellogg's expert reports 0.7
9/1/2017	MD	0.5	review client documents for trial 0.5

Date	Staff	Amount of Time	Description
9/1/2017	JS	0.4	Execute and send LOI to travel agency for trial travel management.
9/1/2017	MD	0.3	call with mediator about clarifying plaintiffs' demand 0.3
9/1/2017	JS	0.1	md/js confer re travel agent for trial 0.1
9/1/2017	MD	0.1	md/js confer re travel agent for trial 0.1
9/1/2017	ME	0.2	telephone call from opt-in with questions about new severance agreement .1; document call in spreadsheet.1
9/1/2017	MD	2	create outline of tasks to complete for trial 2.0
9/1/2017	MD	0.7	read Kellogg's expert's documents 0.7
9/1/2017	MD	3	review witness interviews for trial testimony 3.0
9/1/2017	JS	0.3	Email and voicemail to rep at travel agency re: engaging them for travel management, questions about paperwork.
9/1/2017	JS	0.2	Complete Company profile form for travel agency.
9/5/2017	MS	0.4	AD/MS discuss research project on the type of evidence that can establish just and reasonable inference
9/5/2017	JS	0.1	Update contact information per opt-in email.
9/5/2017	JF	0.1	MD/JF Check-in re upcoming deadlines in the preparation for trial
9/5/2017	MD	0.7	MD/JF Meet to discuss 1. witness confirmation process/outreach to deponents & named plaintiffs .3; 2. the process to assemble witness documents in case folder .2; 3. the process to select responsive documents to be sent to the witness for review prior to trial .2
9/5/2017	JF	0.2	MR/JF Discuss the task to remove thumb print files from case folder for more efficient file management (preparation for the trial)
9/5/2017	AD	0.4	AD/MS discuss research project on the type of evidence that can establish just and reasonable inference
9/5/2017	MD	0.1	MD/JF Check-in re upcoming deadlines in the preparation for trial
9/5/2017	JF	0.3	Sign up for tasks related to management of the trial/deadlines
9/5/2017	MS	0.7	ET/MS conference re strategy for excluding and limiting expert testimony
9/5/2017	MR	0.2	MR/JF Discuss the task to remove thumb print files from case folder for more efficient file management (preparation for the trial)
9/5/2017	AD	0.4	ad/ms Meet to discuss research memo assignment .4
9/5/2017	JF	0.7	MD/JF Meet to discuss 1. witness confirmation process/outreach to deponents & named plaintiffs .3; 2. the process to assemble witness documents in case folder .2; 3. the process to select responsive documents to be sent to the witness for review prior to trial .2
9/5/2017	MS	0.4	ad/ms Meet to discuss research memo assignment .4
9/5/2017	JK	0.5	JK/MR Discuss game plan moving forward with the transfer of damage calculations for trial.
9/5/2017	MS	0.1	md/ms confer about delegation of handling Kellogg's expert testimony 0.1
9/5/2017	MR	0.5	JK/MR Discuss game plan moving forward with the transfer of damage calculations for trial.
9/5/2017	MS	0.3	review ET memo on Dauber as applied to Speakman testimony and develop response
9/5/2017	MD	0.1	md/ms confer about delegation of handling Kellogg's expert testimony 0.1
9/5/2017	JS	0.3	Call to Travel Agency re: forms and next steps
9/5/2017	ME	0.2	draft letter to intake who sent CTS for Smith case but appears to be a part of the Thomas case
9/5/2017	JF	2.8	Review/organize trial folder
9/6/2017	ME	0.2	JF/ME discuss project of reaching out to plaintiff trial witnesses to confirm availability and schedule follow up call with attorney
9/6/2017	CM	0.1	JS/CM discuss billing question re travel arrangements for trial

Date	Staff	Amount of Time	Description
9/6/2017	MD	0.2	MD/ME review details of opt-in's trial witness interview questionnaire responses
9/6/2017	JS	0.5	JS/MD/AD meet to discuss trial plan; process for exhibits and exhibit list
9/6/2017	MD	0.5	JS/MD/AD meet to discuss trial plan; process for exhibits and exhibit list
9/6/2017	AD	0.5	JS/MD/AD meet to discuss trial plan; process for exhibits and exhibit list
9/6/2017	ME	0.7	summary information about ordering provided by trial witnesses during interview to complete questionnaire
9/6/2017	AG	0.1	AG/ME discuss filing consent to sue received from person who might already be opt-in in Thomas case
9/6/2017	JF	0.2	JF/ME discuss project of reaching out to plaintiff trial witnesses to confirm availability and schedule follow up call with attorney
9/6/2017	MD	0.3	MD/JF Meet re outreach to deponents re scheduling of the second round of interviews (trial preparation)
9/6/2017	JS	0.1	Email to MD explaining call with travel leaders and query about scheduling.
9/6/2017	ME	0.1	AG/ME discuss filing consent to sue received from person who might already be opt-in in Thomas case
9/6/2017	ME	0.2	MD/ME review details of opt-in's trial witness interview questionnaire responses
9/6/2017	JF	4.1	Outreach to Kellogg deponents who have not responded to correspondence re the trial/trial scheduling
9/6/2017	JS	0.1	JS/CM discuss billing question re travel arrangements for trial
9/6/2017	JF	0.3	MD/JF Meet re outreach to deponents re scheduling of the second round of interviews
9/6/2017	CLER	0.2	Create PDF format of document recd from D. (Kellogg disclosures of expert testimony of damages)
9/6/2017	MS	2.6	draft Kellogg labor budgeting narrative with annotations for trial and expert challenge
9/7/2017	JS	0.5	Review call notes from Travel Agency conference--type up notes to share with litigation team about process and expectations.
9/7/2017	JS	0.2	Identify and save court- and judge-specific procedures for witness and exhibit lists.
9/7/2017	JS	0.4	Review and provide commentary on memo articulating Kellogg's organizational structure and labor-calculation model(s).
9/7/2017	MD	1	JS/MD/MS/AD/MR/ME Litigation Team Meeting to discuss upcoming deadlines and to-do list; reportage on status for projects including Travel arrangements, Witness communication, exhibit lists, damages, experts and expert testimony expected, and possible time conflicts.
9/7/2017	JS	0.2	Call to confirm contact information, schedule call--JS emailed JF with notification
9/7/2017	MS	1	JS/MD/MS/AD/MR/ME Litigation Team Meeting to discuss upcoming deadlines and to-do list; reportage on status for projects including Travel arrangements, Witness communication, exhibit lists, damages, experts and expert testimony expected, and possible time conflicts.
9/7/2017	MS	0.2	md/ms confer re developing admitted facts to provide defense counsel and identify potential issues defense counsel will try to incorporate into the facts
9/7/2017	MR	1	JS/MD/MS/AD/MR/ME Litigation Team Meeting to discuss upcoming deadlines and to-do list; reportage on status for projects including Travel arrangements, Witness communication, exhibit lists, damages, experts and expert testimony expected, and possible time conflicts.



Date	Staff	Amount of Time	Description
9/7/2017	AD	1	JS/MD/MS/AD/MR/ME Litigation Team Meeting to discuss upcoming deadlines and to-do list; reportage on status for projects including Travel arrangements, Witness communication, exhibit lists, damages, experts and expert testimony expected, and possible time conflicts.
9/7/2017	ME	1	JS/MD/MS/AD/MR/ME Litigation Team Meeting to discuss upcoming deadlines and to-do list; reportage on status for projects including Travel arrangements, Witness communication, exhibit lists, damages, experts and expert testimony expected, and possible time conflicts.
9/7/2017	MD	0.2	md/ms confer re developing admitted facts to provide defense counsel and identify potential issues defense counsel will try to incorporate into the facts
9/7/2017	ME	0.5	work on compiling exhibits that correlate to arguments in plaintiffs' motion for class certification to prepare trial exhibits
9/7/2017	MS	2.6	draft annotated narrative of Kellogg Variable Labor presentation and evidence for trial
9/7/2017	JS	0.4	Create header for Travel Agency to insert into forms for clients, .3; email to TL, .1
9/7/2017	ME	0.3	review trial exhibit list spreadsheet .2; email MS about any additional changes he might need .1
9/7/2017	AD	1.8	Research just and reasonable inference standard for expert memo 1.8
9/7/2017	MS	0.5	review Kellogg motion to dismiss and decertify and exhibits
9/7/2017	AD	1.1	Research Local rules on exhibits 1.1
9/7/2017	JS	1	JS/MD/MS/AD/MR/ME Litigation Team Meeting to discuss upcoming deadlines and to-do list; reportage on status for projects including Travel arrangements, Witness communication, exhibit lists, damages, experts and expert testimony expected, and possible time conflicts.
9/7/2017	JS	0.2	Pre-fill CC auth form
9/8/2017	MS	0.6	md/ms conference call with local counsel about trial attendance and trial prep 0.6
9/8/2017	JS	0.3	JS/ME discuss process for isolating document cites from briefs in order to assemble as exhibits.
9/8/2017	JS	1	JS/AD meet to discuss process for generating exhibit list
9/8/2017	MS	0.5	md/ms confer about which local counsel is preferred based on their strengths 0.5
9/8/2017	MD	0.6	md/ms conference call with local counsel about trial attendance and trial prep 0.6
9/8/2017	MD	0.3	JS/MD discuss exhibits list--documents needed for individual plaintiffs.
9/8/2017	JS	0.2	JS/MD discuss language for use in email to clients about travel arrangements.
9/8/2017	MD	0.2	JS/MD discuss language for use in email to clients about travel arrangements.
9/8/2017	JS	0.1	JS/CM review financial arrangements with travel agent for travel for trial witnesses
9/8/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#440 D. REQUEST for Judicial Notice in Support of Mot and Decertify)
9/8/2017	CM	0.1	JS/CM review financial arrangements with travel agent for travel for trial witnesses
9/8/2017	JS	0.3	JS/MD discuss exhibits list--documents needed for individual plaintiffs.
9/8/2017	JS	0.4	Complete paperwork for Credit Card Authorization and fax to Travel Agent
9/8/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#439 K Motion to Dismiss and Decertify)

Date	Staff	Amount of Time	Description
			JS/ME discuss process for isolating document cites from briefs in order to assemble as
9/8/2017	ME	0.3	exhibits.
9/8/2017	MR	0.4	JS/MR work on Credit Card Authorization for Travel Agency
9/8/2017	JS	0.4	JS/MR work on Credit Card Authorization for Travel Agency
9/8/2017	MD	0.5	md/ms confer about which local counsel is preferred based on their strengths 0.5
9/8/2017	JS	0.5	Draft initial exhibit list outline
9/8/2017	AD	1	JS/AD meet to discuss process for generating exhibit list
9/8/2017	MS	0.2	email to ET re Kellogg motion to dismiss/decertify
9/8/2017	JF	5.3	Outreach to Kellogg deponents who have not responded to correspondence re the trial/trial scheduling
9/8/2017	MS	0.2	review Kellogg request for judicial notice
9/8/2017	MD	0.2	MD/JF Meet re pre-trial order (status of confirmation of trial attendance/outreach of deponents who have not responded)
9/8/2017	MD	0.3	MD/MS discuss strategy for addressing Kellogg's motion to dismiss/decertify
9/8/2017	MD	0.3	JS/MD discuss exhibit list--what we need to add.
9/8/2017	MS	0.3	MD/MS discuss strategy for addressing Kellogg's motion to dismiss/decertify
9/8/2017	JF	0.2	MD/JF Meet re pre-trial order (status of confirmation of trial attendance/outreach of deponents who have not responded)
9/8/2017	JS	0.3	JS/MD discuss exhibit list--what we need to add.
9/8/2017	MS	1.1	legal research on personal jurisdiction question raised in Kellogg's motion to dismiss
9/11/2017	MR	0.8	JK/MR Initiate handoff of damage calculations by reviewing all original file of payroll production.
9/11/2017	MD	0.3	md/ms confer on damages presentation to jury and response to Kellogg's motion along with Plaintiffs motion to exclude experts 0.3
9/11/2017	JF	0.6	MD/JF Discuss the tasks to 1. finalize deponent outreach .2; 2. fill in the master witness chart fields with pertinent information .2; 3. assemble documents into brochures for witness review .1; 4. travel to Tacoma, WA .1
9/11/2017	JK	0.8	JK/MR Initiate handoff of damage calculations by reviewing all original file of payroll production.
9/11/2017	JF	0.1	JF/ME review discussing severance agreement with concerned opt-ins
9/11/2017	MD	4.5	drafting proof chart 4.5
9/11/2017	JK	1.8	JK Review and organize data described in damages hand off meeting.
9/11/2017	MD	0.2	md/mr mr update md on process for calculating trial damages 0.2
9/11/2017	ME	0.2	telephone call from opt-in with questions about signing severance agreement and its impact on claims in this case
9/11/2017	ME	0.1	JF/ME review discussing severance agreement with concerned opt-ins
9/11/2017	JK	0.8	JK/MR Initiate handoff of damage calculations by reviewing all original file of payroll production.
9/11/2017	MS	0.3	md/ms confer on damages presentation to jury and response to Kellogg's motion along with Plaintiffs motion to exclude experts 0.3
9/11/2017	JF	0.5	JS/JF discuss exhibits, plaintiff documents, scheduling, outreach.
9/11/2017	MD	0.6	MD/JF Discuss the tasks to 1. finalize deponent outreach .2; 2. fill in the master witness chart fields with pertinent information .2; 3. assemble documents into brochures for witness review .1; 4. travel to Tacoma, WA .1
9/11/2017	JS	0.5	JS/JF discuss exhibits, plaintiff documents, scheduling, outreach.
9/11/2017	JS	4.6	Locate and assemble exhibit documents for trial; generate and maintain internally-hyperlinked index.

Date	Staff	Amount of Time	Description
9/12/2017	JF	0.1	ME/JF Check-in re availability of witness master spreadsheet to upload specific information re witness availability to travel
9/12/2017	ME	0.2	MD/ME explain project of filling in data about trial witnesses on tracking spreadsheet
9/12/2017	JF	0.1	AN/JF Discuss deponent/trial witness outreach via text
9/12/2017	JK	2.1	jk Combine all 16 payroll files from 6.17 production into one Excel workbook with each file on a separate tab.
9/12/2017	ME	0.1	JF/ME discuss source of data regarding trial witness job summaries
9/12/2017	ME	1.5	begin review trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/12/2017	JF	0.1	MD/JF Discuss tasks to be done while traveling outside the office
9/12/2017	JS	0.5	MD/JS/JF Meet to discuss handling of pre-trial travel arrangements for witnesses
9/12/2017	MD	0.5	MD/JS/JF Meet to discuss handling of pre-trial travel arrangements for witnesses
9/12/2017	JF	0.2	JS/JF Meet to discuss handling of the witness communication in JF's absence from the office
9/12/2017	JF	0.1	JF/ME discuss source of data regarding trial witness job summaries
9/12/2017	JF	3.1	Outreach to Kellogg witnesses re scheduling of pre-trial interview with attorney/trial attendance
9/12/2017	JK	1.6	jk Create Microsoft OneNote notes on the treatment of 6//17 payroll production.
9/12/2017	MD	0.2	MD/JF Meet to discuss additional tasks re pre-trial witness information/document packet (pre-trial witness preparation)
9/12/2017	AN	0.1	AN/JF Discuss deponent/trial witness outreach via text
9/12/2017	MD	0.2	MD/ME explain project of filling in data about trial witnesses on tracking spreadsheet
9/12/2017	MD	0.1	MD/JF Discuss tasks to be done while traveling outside the office
9/12/2017	ME	0.1	ME/JF Check-in re availability of witness master spreadsheet to upload specific information re witness availability to travel
9/12/2017	JS	0.2	JS/JF Meet to discuss handling of the witness communication in JF's absence from the office
9/12/2017	JF	0.2	MD/JF Meet to discuss additional tasks re pre-trial witness information/document packet (pre-trial witness preparation)
9/12/2017	JK	0.3	jk Coordinate through email with team when to meet to discuss trial damages.
9/12/2017	JK	1.8	jk Determine which files of the 16 payroll files produced 6/17 have matching headers so they can later be combined.
9/12/2017	MD	2	edit proof chart 2.0
9/12/2017	MR	0.2	Follow-up work on witness list employment dates
9/12/2017	JF	0.5	MD/JS/JF Meet to discuss handling of pre-trial travel arrangements for witnesses
9/12/2017	JK	1.8	jk Review all 16 payroll files produced 6/2017
9/12/2017	ME	0.7	verify accuracy of trial witnesses job summaries on tracking spreadsheet
9/12/2017	MD	4	drafting jury instructions 4.0
9/12/2017	MR	0.5	Created opt-in date ranges for witness information
9/12/2017	JS	0.2	JS/JF discuss travel issues for plaintiffs--periods unavailable for travel or attendance, other issues.
9/12/2017	JF	0.2	JS/JF discuss travel issues for plaintiffs--periods unavailable for travel or attendance, other issues.

Date	Staff	Amount of Time	Description
9/13/2017	AN	0.4	Search for email address used to send text to cell phone numbers for multiple plaintiffs
9/13/2017	JS	0.2	Confirm travel agent's receipt of CC authorization and other documents
9/13/2017	CLER	0.3	Transfer documents recd from ECF system to docket file and create file copy (Docket#429 - OFFICIAL TRANSCRIPT of Motion Hearing held on 11/21/2016)
9/13/2017	JK	0.5	JK/MD/MR Discuss work projections for upcoming trial damage calculation deadline.
9/13/2017	ME	2.2	compile portions of briefs that discuss time studies to assist attorneys with trial preparation
9/13/2017	MD	0.5	JK/MD Review most efficient way to proceed to meet trial deadlines.
9/13/2017	MD	0.3	responding to ET via email re damages issues to help with response re motion for decertification 0.3
9/13/2017	MR	1	JK/MR Discuss next steps for moving forward with payroll towards damage calculations
9/13/2017	JS	0.5	Draft update for approval and update website with current case status
9/13/2017	ME	0.4	search defendants' discovery production for a document requested by attorney for trial preparation
9/13/2017	ME	0.2	MD/ME discuss project of compiling portions of briefs that discuss time studies to prepare for trial
9/13/2017	JS	0.2	Email case update to opt-in per request
9/13/2017	MR	0.5	JK/MD/MR Discuss work projections for upcoming trial damage calculation deadline.
9/13/2017	MD	0.5	JK/MD/MR Discuss work projections for upcoming trial damage calculation deadline.
9/13/2017	MD	0.2	MD/ME discuss project of compiling portions of briefs that discuss time studies to prepare for trial
9/13/2017	JK	0.5	JK/MD Review most efficient way to proceed to meet trial deadlines.
9/13/2017	JK	1.7	JK Analysis of 6/21/17 payroll which led to the determination that the payroll is really 2 sets:earnings or deduction reimbursements.
9/13/2017	JK	1	JK Create documentation on the 4 different groups of schemas in the payroll from the 6/21/17
9/13/2017	MD	2	edit proof chart 2.0
9/13/2017	MD	0.5	review oral argument on summary judgment to highlight provision to provide ET for arguments against decertification and dismissal 0.5
9/13/2017	JK	1	JK Create documentation on the 4 different groups of payroll from the 6/21/17
9/13/2017	ME	1.6	continue review trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/13/2017	ME	0.6	continue review trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/13/2017	DG	0.8	md/dg confer about Kellogg trial issues, including deposition transcripts to use, arguments re good faith/willfulness, and trial exhibits .2; research law on good faith/waiver .6
9/13/2017	JK	1	JK/MR Discuss next steps for moving forward with payroll towards damage calculations
9/13/2017	JK	1.6	jk Combine all payroll files with matching headers from 6/17 payroll production.
9/13/2017	MD	0.2	md/dg confer about Kellogg trial issues, including deposition transcripts to use, arguments re good faith/willfulness, and trial exhibits

Date	Staff	Amount of Time	Description
9/13/2017	CLER	0.5	Transfer documents recd from ECF system to docket file and create file copy (Docket#336 - P. Revised Proposed Jury Instructions 380 P. Proposed Modified Jury Instructions, 341 - P. Proposed Jury Instructions, 290 JOINT TRIAL MEMO (3.09CV1285(AWT)
9/13/2017	JK	0.6	jk Create logbook entry describing procedure for combination of all payroll files with matching headers from 6/17 payroll production.
9/13/2017	MD	0.5	review bonus awards to determine inclusion in regular rate 0.5
9/13/2017	MR	0.1	Add JK to case email distribution list
9/13/2017	JF	0.3	JF/ME connect DT search on JF computer to defendants' email discovery for trial preparation
9/13/2017	JS	0.2	Email case update to opt-in
9/13/2017	ME	0.3	JF/ME connect DT search on JF computer to defendants' email discovery for trial preparation
9/13/2017	JS	2.5	Assemble exhibits for trial, maintain hyperlinked internal index of documents.
9/13/2017	MD	0.1	reviewing docket entires for jury instructions to download 0.1
9/14/2017	ME	0.1	MD/ME determine proper formatting of witness addresses for Pretrial Order
9/14/2017	MD	0.1	email JS re mock trial needs 0.1
9/14/2017	JF	0.4	ME/JF Check-in re workload/current tasks
9/14/2017	MD	0.1	MD/ME determine proper formatting of witness addresses for Pretrial Order
9/14/2017	ME	0.2	AN/ME discuss project of compiling witness addresses into one spreadsheet for pretrial order
9/14/2017	ME	0.2	MD/ME discuss process for reviewing defendants' production of trial witness emails
9/14/2017	AN	0.2	AN/ME discuss project of compiling witness addresses into one spreadsheet for pretrial order
9/14/2017	MD	2	drafting jury instructions 2.0
9/14/2017	JF	0.7	Prepare witness documents for binding into trial booklet form (trial preparation)
9/14/2017	MD	1.2	review sample jury instructions from other cases 1.2
9/14/2017	JK	1.2	JK Investigate the different paycodes present in the 6.21.17 earning production data.
9/14/2017	JK	0.6	JK Log progress on data analysis to use for later writing
9/14/2017	AD	1.4	Research for motion in limine 1.4
9/14/2017	JK	1.1	JK Remove all duplicates from single earnings spreadsheet
9/14/2017	ME	0.9	MD/MS/AD/JF/JS/ME team meeting to review status of trial preparation projects .8; and discuss any upcoming work conflicts .1
9/14/2017	ME	0.3	JS/ME discuss process to determine best practices for reviewing trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/14/2017	JK	1.1	JK Combine all payroll from 6.27.17 into a single earnings spreadsheet
9/14/2017	AN	1	Create spreadsheet with list of addresses for plaintiff trial witnesses
9/14/2017	ME	0.1	search defendants' production for job description document requested by attorney
9/14/2017	JK	1.9	JK Determine the best way to remove duplicates from combined 6.21.17 payroll production
9/14/2017	ME	0.2	MD/ME determine best practice for tracking witness documents regarding hours worked in spreadsheet for trial preparation
9/14/2017	MD	0.2	MD/ME discuss process for reviewing defendants' production of trial witness emails
9/14/2017	MD	0.2	MD/ME determine best practice for tracking witness documents regarding hours worked in spreadsheet for trial preparation

Date	Staff	Amount of Time	Description
9/14/2017	ME	4.2	continue reviewing trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/14/2017	JK	0.3	JK Write email to team regarding the lack of unique payroll transaction ID and how to determine if duplicates exist.
9/14/2017	MD	0.1	md/ms confer on ms responsibility for deposition designations and trial brief 0.1
9/14/2017	JS	0.9	MD/MS/AD/JF/JS/ME team meeting to review status of trial preparation projects .8; and discuss any upcoming work conflicts .1
9/14/2017	MD	0.9	MD/MS/AD/JF/JS/ME team meeting to review status of trial preparation projects .8; and discuss any upcoming work conflicts .1
9/14/2017	MD	0.2	md/ms confer re agreeing to decertify RSMs 0.2
9/14/2017	AD	0.9	MD/MS/AD/JF/JS/ME team meeting to review status of trial preparation projects .8; and discuss any upcoming work conflicts .1
9/14/2017	JF	0.9	MD/MS/AD/JF/JS/ME team meeting to review status of trial preparation projects .8; and discuss any upcoming work conflicts .1
9/14/2017	MS	0.1	md/ms confer on ms responsibility for deposition designations and trial brief 0.1
9/14/2017	MS	0.9	MD/MS/AD/JF/JS/ME team meeting to review status of trial preparation projects .8; and discuss any upcoming work conflicts .1
9/14/2017	ME	0.4	ME/JF Check-in re workload/current tasks
9/14/2017	MD	0.2	email local counsel re trial support 0.2
9/14/2017	JS	0.2	Email case update to opt-in.
9/14/2017	MD	0.1	draft agenda for team meeting 0.1
9/14/2017	JF	0.3	Outreach to RSRs who have not responded to my previous attempts to schedule pre-trial interview
9/14/2017	MD	0.2	edit proof chart 0.2
9/14/2017	MS	0.2	md/ms confer re agreeing to decertify RSMs 0.2
9/14/2017	JS	0.2	Call with recruiter to schedule fact-finding call for trial evaluation
9/14/2017	MD	0.5	research ability to compel corporate witnesses to testify 0.5
9/14/2017	JS	0.3	JS/ME discuss process to determine best practices for reviewing trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/14/2017	JS	0.2	Generate hyperlinked index of "selected plt witnesses" folder in order to more easily review documents for exhibits.
9/14/2017	ME	0.4	continue reviewing trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/14/2017	MD	0.2	review MR pay code comments for damage calculations 0.2
9/14/2017	JK	2.2	JK Research how to use SQL queries within excel as a means to efficiently carry out complicated calculations.
9/15/2017	JK	1.2	JK Investigate what day of the week and cycle paydays end on
9/15/2017	ME	2.5	continue reviewing trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/15/2017	MD	0.2	MD/JF Check-in re 1. the process to bind witness documents together .1; 2. witness availability to travel to trial .1
9/15/2017	MD	1.5	editing proof chart with additional exhibits 1.5
9/15/2017	MD	0.5	edit proof chart, including adding potential exhibits 0.5
9/15/2017	JK	0.4	JK Remove all duplicate payroll information from 6.21.17 payroll data
9/15/2017	CM	0.1	CM/JF Discuss the process to put together witness documents booklets
9/15/2017	AG	0.1	AG/CM review possible methods of binding trial booklets for witnesses
9/15/2017	MD	0.5	review data for bonus inclusion in regular rate for trial for damages 0.5
9/15/2017	JK	1.6	JK Add conversion of all paydays to the closest pay day within the payroll cycle.



Date	Staff	Amount of Time	Description
9/15/2017	JF	0.1	CM/JF Discuss the process to put together witness documents booklets
9/15/2017	ME	0.4	continue reviewing trial witness documents to indicate any regarding hours worked (to prepare for trial)
9/15/2017	JK	2.4	JK Attempt to use vlookup excel function to transpose all payroll data so that each payroll code is in its own column
9/15/2017	CM	0.1	JF/CM discuss preparation of trial booklets for witnesses
9/15/2017	MD	1.5	edit proof chart, including questions to ask clients on stand 1.5
9/15/2017	MD	0.3	ms/md confer about arguments to make re willfull jury instruction 0.3
9/15/2017	MD	0.3	talk to client about obligation to appear at trial 0.3
9/15/2017	JK	0.2	JK/MR Discuss progress on Kellogg damage calculatons
9/15/2017	JK	0.8	JK Use pivot table to transpose all payroll data so that each payroll code is in its own column
9/15/2017	CM	1.6	compile information for spot-checking of payroll information
9/15/2017	CM	0.1	AG/CM review possible methods of binding trial booklets for witnesses
9/15/2017	MS	0.3	ms/md confer about arguments to make re willfull jury instruction 0.3
9/15/2017	JF	0.1	JF/CM discuss preparation of trial booklets for witnesses
9/15/2017	MR	0.2	JK/MR Discuss progress on Kellogg damage calculatons
9/15/2017	MR	0.7	MD/MR follow-up meeting on pay code classifications
9/15/2017	MD	0.2	JS/MD discuss possible rentals for trial
9/15/2017	JS	0.5	Research possible places to stay for the duration of trial in November-December
9/15/2017	JS	0.2	JS/MD discuss possible rentals for trial
9/15/2017	JF	0.1	ME/JF Request to update the master spreadsheet with trial availability/preference of witness
9/15/2017	JF	0.2	MD/JF Check-in re 1. the process to bind witness documents together .1; 2. witness availability to travel to trial .1
9/15/2017	JF	0.2	Call with trial witness re travel arrangements
9/15/2017	MR	0.1	MR/CM review spreadsheet for cross-checking pay information
9/15/2017	JK	0.4	JK Remove all duplicate payroll information from 6.21.17 payroll data
9/15/2017	CM	0.1	ME/CM find paystubs in Defendant's production for cross-checking pay information
9/15/2017	CM	0.1	MR/CM review spreadsheet for cross-checking pay information
9/15/2017	ME	0.1	ME/JF Request to update the master spreadsheet with trial availability/preference of witness
9/15/2017	MD	0.7	MD/MR follow-up meeting on pay code classifications
9/15/2017	ME	0.1	locate document requested by attorneys for damage calculations for trial preparation
9/15/2017	MD	3.5	editing jury instructions 3.5
9/15/2017	ME	0.1	ME/CM find paystubs in Defendant's production for cross-checking pay information
9/15/2017	ME	0.3	compile documents requested by attorneys for damage calculations for trial preparation
9/17/2017	MR	3.5	Examine extrapolations in context of Defense Counsel response .5; Revise missing pay data sheet to include RSM weeks 1.1; Perform calculations to isolate long stretches of missing pay data 1.5; Add column to make trial witnesses .4;
9/17/2017	MR	0.4	Create draft text for letter to Def Counsel about pay codes .4
9/17/2017	MR	0.4	Investigate issue of searching on Production Bates Stamped numbers to find documents
9/18/2017	JS	0.5	Call with Shea McVaugh from Pipeline Recruiting re: possible focus group

Date	Staff	Amount of Time	Description
9/18/2017	MR	0.5	JK/MR review various issues with developing damage calcs
			JK Add description of all of the work regarding 3.1.2017 payroll into trial preparation
9/18/2017	JK	1.7	narrative.
9/18/2017	JK	1.6	JK Review all 5 payroll files produced on 3.1.2017 before combining
9/18/2017	MA	0.8	begin review of jury instructions
9/18/2017	MD	1.5	edit jury instructions 1.5
			MD/ME discuss potential method for reviewing witness emails produced by defense
9/18/2017	MD	0.2	counsel during discovery for trial preparation
			begin compiling emails produced by defendants during discovery for each plaintiff trial
9/18/2017	ME	0.3	witness
9/18/2017	MD	0	outlining proof chart 1.5
			determine best method for reviewing witness emails produced by defense counsel for
9/18/2017	ME	0.5	trial preparation
9/18/2017	JK	0.6	JK remove duplicates from all 5 payroll files from 3.1.17
9/18/2017	MD	0.5	Call with Shea McVaugh from Pipeline Recruiting re: possible focus group
9/18/2017	JK	0.5	JK Combine all 5 payroll files from 3.1.17
9/18/2017	JS	0.8	Format and proof brief
9/18/2017	JK	0.5	JK/MR review various issues with developing damage calcs
9/18/2017	JK	1.6	JK use pivot table to attribute each payroll record to the closest regular Friday payday
			MD/JF Check-in re production/documents needed to assemble witness brochures (trial
9/18/2017	JF	0.3	preparation)
			MD/ME discuss potential method for reviewing witness emails produced by defense
9/18/2017	ME	0.2	counsel during discovery for trial preparation
9/18/2017	ME	0.1	MR/ME review status of DT Search email index for trial preparation
9/18/2017	JK	0.8	JK combine all payroll records that occur on the same payday
9/18/2017	MR	0.1	Read/reply to emails about Kellogg docs from ME, MD
9/18/2017	MD	0.2	edit initial disclosures 0.2
9/18/2017	MD	0.1	send of counsel initial disclosures for review 0.1
9/18/2017	MR	0.1	Read/reply to JK email about class list
9/18/2017	MR	0.2	Read/reply multiple emails in thread about check and pay period end date
			review Central case file for evidence of introducing JK as witness to assist attorneys in
9/18/2017	MA	0.3	preparing for Kellogg trial
9/18/2017	ME	0.2	create class list to assist JK with damage calculations
9/18/2017	MR	0.2	Revise draft pay code letter for MD
9/18/2017	MD	0.2	prepare for call with mock trial provider 0.2
			MD/ME provide status update on project reviewing plaintiff documents to indicate any
9/18/2017	ME	0.1	about hours worked for trial preparation
			telephone call with opt-in to confirm she is the same person who sent a CTS for the Smith
9/18/2017	ME	0.2	case
			continue reviewing trial witness documents to indicate any regarding hours worked (to
9/18/2017	ME	3.4	prepare for trial)
9/18/2017	MD	0.2	email defense counsel concerning trial witnesses 0.2
9/18/2017	MD	0.8	review Kellogg produced emails for trial purposes 0.8
9/18/2017	ME	0.2	MR/ME discuss discrepancies in data regarding division worked and job titles
9/18/2017	MD	0.2	email defense counsel concerning pay codes for FRE 1006 exhibit 0.2
9/18/2017	MR	0.2	MR/ME discuss discrepancies in data regarding division worked and job titles
			MD/ME provide status update on project reviewing plaintiff documents to indicate any
9/18/2017	MD	0.1	about hours worked for trial preparation
9/18/2017	MD	0.1	email McCart's counsel for evidence at trial 0.1

Date	Staff	Amount of Time	Description
9/18/2017	MR	0.1	Transfer lab work files back to server
			ME/JF Check-in re relevant documents needed for collection/production of witness
9/18/2017	ME	0.2	brochures
9/18/2017	MD	2.5	edit proof chart 2.5
9/18/2017	MR	2.9	Work on report for MS re: opt-ins with special job positions
9/18/2017	MD	0.1	review opposition to motion to dismiss 0.1
			read Defendants' Motion to Dismiss Out-of-State Opt-ins Based on New Supreme Court Case and to Decertify FLSA Collective Action Based on Smith v. Kellogg Sales Company
9/18/2017	ME	0.3	and Absence of Expert Testimony
9/18/2017	MR	0.1	Read/reply to follow-up email about payday references
9/18/2017	MR	0.1	MR/ME review status of DT Search email index for trial preparation
9/18/2017	MD	1.5	edit proof chart 1.5
			Review correspondence (received over weekend) from Harbor Home Rentals re: possible
9/18/2017	JS	0.4	house for litigation-team trial lodging.
			ME/JF Check-in re relevant documents needed for collection/production of witness
9/18/2017	JF	0.2	brochures
			MD/JF Check-in re production/documents needed to assemble witness brochures (trial
9/18/2017	MD	0.3	preparation)
9/19/2017	MD	2.5	edit jury instructions to include case and statutory citations 2.5
9/19/2017	MR	0.2	md/mr confer re cell phone research project for proof of damages 0.2
			MR/AN Review spreadsheet showing plaintiffs that are missing weeks of payroll
9/19/2017	MR	0.2	information
9/19/2017	MD	0.3	review documents for exhibit list 0.3
9/19/2017	JS	0.2	Attempt write-compare of two versions of initial disclosures
9/19/2017	JK	0.2	JK Combine all Opt-in payroll data produced on 10.9.15.
9/19/2017	ME	1.9	compile emails produced by defendants during discovery for each plaintiff trial witness
9/19/2017	JS	0.2	Compare by eye two versions of initial disclosures; convey changes to attorney.
9/19/2017	MD	0.2	md/mr confer re cell phone research project for proof of damages 0.2
			MD/JS[in part]/ME review proof chart for trial preparation to identify any documents
9/19/2017	ME	1.1	that should be compiled for potential use as trial exhibits
			research burden of proving the fluctuating workweek and caselaw against application of
9/19/2017	MD	2.5	FWW in 9th Circuit 2.5
9/19/2017	MD	0.5	review MA edits of jury instructions 0.5
9/19/2017	ME	0.2	ME/AN Examine spreadsheet of plaintiff data regarding dates worked
9/19/2017	JK	0.6	JK Combine all state class and opt-in payroll data from 10.9.15 production
			MD/JS[in part]/ME review proof chart for trial preparation to identify any documents
9/19/2017	JS	0.9	that should be compiled for potential use as trial exhibits
9/19/2017	JK	0.3	JK Remove all duplicate rows from all Opt-in payroll data produced on 10.9.15.
9/19/2017	MD	0.1	email defense counsel amended initial disclosures 0.1
9/19/2017	JK	0.3	JK Remove all duplicate rows from all Opt-in payroll data produced on 10.9.15.
9/19/2017	JK	0.2	JK Combine all State Class payroll data produced on 10.9.15.
			MD/JS[in part]/ME review proof chart for trial preparation to identify any documents
9/19/2017	MD	1.1	that should be compiled for potential use as trial exhibits
9/19/2017	MR	1.5	Use DTsearch to search for other full KUSA roster sheets in email productions
9/19/2017	MD	0.5	edit initial disclosures to include Jason Kandel and FRE 1006 exhibit 0.5
9/19/2017	AN	0.2	ME/AN Examine spreadsheet of plaintiff data regarding dates worked
9/19/2017	JK	0.3	JK Remove all duplicate rows from all State Class payroll data produced on 10.9.15.

Date	Staff	Amount of Time	Description
9/19/2017	JK	0.6	JK Remove duplicates from all combined payroll data from 10.9.15 production
9/19/2017	JK	0.9	JK Document today's work on 10.9.15 payroll production into narrative for trial.
9/19/2017	JS	0.3	Email to asst. prop. mgr. at HHR re: trial rental for litigation team
9/19/2017	JK	0.4	MD/JK Review progress on damage calculations.
9/19/2017	MR	2.2	Complete work on opt-in report for MS
9/19/2017	MR	0.3	MD/MR review various issues of damage calculations
9/19/2017	AN	0.2	MR/AN Review spreadsheet showing plaintiffs that are missing weeks of payroll information
9/19/2017	AN	1.5	Research Defendants' production for reasons for missing payroll for multiple plaintiffs
9/19/2017	MR	1.2	Create worksheet for project to check weeks of missing pay data
9/19/2017	AN	0.1	AN/MR Discuss plan for project of checking weeks of missing pay data
9/19/2017	MR	1	work on sample VBA script to spread bonuses for JK
9/19/2017	MD	0.3	MD/MR review various issues of damage calculations
9/19/2017	MD	0.4	MD/JK Review progress on damage calculations.
9/19/2017	ME	0.1	MD/ME review best practices for compiling plt witness emails from defendants' discovery production
9/19/2017	MD	0.1	MD/ME review best practices for compiling plt witness emails from defendants' discovery production
9/19/2017	MR	0.1	AN/MR Discuss plan for project of checking weeks of missing pay data
9/19/2017	ME	1	compile emails produced by defendants during discovery for each plaintiff trial witness
9/19/2017	MA	2.4	proofread jury instructions
9/20/2017	JS	1.4	Research possible companies to assist with mock trial.
9/20/2017	AN	4	Research all data on file to identify reasons for missing payroll for multiple plaintiffs
9/20/2017	AN	0.2	MR/AN Review spreadsheet showing plaintiffs that are missing weeks of payroll information
9/20/2017	MR	0.2	MR/AN Review spreadsheet showing plaintiffs that are missing weeks of payroll information
9/20/2017	JS	0.2	Locate and circulate spreadsheet with region and zone info to team.
9/20/2017	JK	1.8	JK remove all duplicates from combined payroll list
9/20/2017	JK	1.4	JK investigate issue where PSID number for the same employee for the same weeks were different between the two payroll sets.
9/20/2017	JK	0.8	JK add all 3.1.17 and 10.9.15 payroll together
9/20/2017	JS	0.4	JS/MD meet to discuss exhibit list; process and timing
9/20/2017	JS	2.7	Continue assemblage of trial exhibits for exhibit list; identify and locate documents.
9/20/2017	MD	0.4	JS/MD meet to discuss exhibit list; process and timing
9/20/2017	MD	0.6	JS/MD meet to discuss exhibit list; preparation and assembly of provisional list
9/20/2017	MR	0.6	JK/MR Investigate if weeks that occur in the old payroll that are not in the new payroll fall within the SOL or job titles with damages.
9/20/2017	MR	2.4	Work on deduplication of combined job history spreadsheet to identify unique entries in older job history data
9/20/2017	JS	0.6	JS/MD meet to discuss exhibit list; preparation and assembly of provisional list
9/20/2017	AG	0.6	research (jury instructions from Monroe v. FTS, 2:08-cv-2100 WD Tenn)
9/20/2017	MD	3	edit proof chart 3.0
9/20/2017	JK	0.6	JK/MR Investigate if weeks that occur in the old payroll that are not in the new payroll fall within the SOL or job titles with damages.
9/20/2017	MR	4.8	Initial work on cell phone calls with DM project

Date	Staff	Amount of Time	Description
9/20/2017	JK	2.4	JK compare combined old payroll sets to newest payroll production to determine if there are any missing weeks.
9/20/2017	MD	3	review exhibits to include in proof chart 3.0
9/20/2017	MR	0.3	read/reply to JS email about opt-in list of zones/regions .1; send email noting different excel sheet with opt-ins/territory cross-reference .2
9/20/2017	JS	0.1	Email to Harbor Home Rentals re: house for trial
9/21/2017	MD	0.6	MD/ET/MS discuss strategy for jury instructions and briefing on effect of certification on burden of proof
9/21/2017	JF	0.5	Task to crosscheck witnesses who worked in the capacity of an RSM
9/21/2017	MR	1	Complete project comparing 10-9-2015 job history datasets with March 2017 for non-duplicates .9; email results/explanation to JK .1
9/21/2017	MD	4	edit proof chart to refine arguments and include additional exemptions 4.0
9/21/2017	MS	0.1	request consent to extension of deadlines re various motions
9/21/2017	JF	0.6	Draft/send email to MD re documents to be pulled/edited for witness brochure (trial preparation)
9/21/2017	MD	0.5	draft question outline for witnesses 0.5
9/21/2017	MR	0.1	MD/MR/AN Review payroll data received for plaintiff
9/21/2017	JK	0.4	JK Prepare for meeting with team to discuss damages.
9/21/2017	MD	0.1	MD/MR/AN Review payroll data received for plaintiff
9/21/2017	MD	0.2	review letter sent to clients stating claim 0.2
9/21/2017	MS	0.3	review ET memo on jury instruction strategies in preparation for call
9/21/2017	AN	0.1	MD/MR/AN Review payroll data received for plaintiff
9/21/2017	MD	0.4	review deposition testimony for OT testimony in morning foods 0.4
9/21/2017	JK	2.2	JK Begin writing custom excel function to spread bonuses between the last time which they occurred.
9/21/2017	MR	0.3	JK/MR discuss progress of damage calcs project .1; results of job history dataset comparison .1; need for examination of older payroll data that is within FLSA SOL and not duplicated in June 2017 payroll data .1
9/21/2017	JF	0.1	MS/MD/JF Discuss the timing/requests for extensions for motions related to trial/trial preparations
9/21/2017	MD	0.1	review witness list for hours worked 0.1
9/21/2017	MS	0.3	ET/MS discuss strategy with respect to RSM claims, including decertification
9/21/2017	JF	1.1	Review the documents cued up to be sent in the witness brochure (trial preparation)
9/21/2017	JF	0.2	MA/JF Discuss strategies to prepare the witnesses for the trial stand in the most effective way/fashion
9/21/2017	MR	0.1	JK/MR follow-up discussion on older payroll rows with FLSA SOL
9/21/2017	AN	3	Research all data on file to identify reasons for missing payroll for multiple plaintiffs
9/21/2017	MS	0.6	MD/ET/MS discuss strategy for jury instructions and briefing on effect of certification on burden of proof
9/21/2017	MA	0.2	MA/JF Discuss strategies to prepare the witnesses for the trial stand in the most effective way/fashion
9/21/2017	JK	0.1	JK/MR follow-up discussion on older payroll rows with FLSA SOL
9/21/2017	MD	0.4	reviewing hours worked by selected witnesses 0.4
9/21/2017	JS	1.6	Add exhibits to exhibit list
9/21/2017	MS	0.1	MS/MD/JF Discuss the timing/requests for extensions for motions related to trial/trial preparations
9/21/2017	JK	0.8	JK/MR/MD Review questions that need to be answered in order to continue with damage calculations.

Date	Staff	Amount of Time	Description
9/21/2017	MD	0.1	MS/MD/JF Discuss the timing/requests for extensions for motions related to trial/trial preparations
9/21/2017	JK	2.3	JK Investigate how to utilize excels user defined function capability to deal with the different type of bonus spreading.
9/21/2017	MR	0.3	identify 36 rows of older payroll data that is within FLSA SOL and not duplicated in June 2017 payroll data .3
9/21/2017	MD	0.8	JK/MR/MD Review questions that need to be answered in order to continue with damage calculations.
9/21/2017	JK	0.3	JK/MR discuss progress of damage calcs project .1; results of job history dataset comparison .1; need for examination of older payroll data that is within FLSA SOL and not duplicated in June 2017 payroll data .1
9/21/2017	MR	0.8	JK/MR/MD Review questions that need to be answered in order to continue with damage calculations.
9/21/2017	MA	1.5	proofread jury post-instructions
9/22/2017	JF	0.9	Research/assemble various planograms to be included in the witness brochure
9/22/2017	JS	0.2	Respond to email from Harbor Home Rentals re: trial lodging rental agreement
9/22/2017	MR	2.5	Perform phone bill text file manipulation work to obtain phone number
9/22/2017	JS	0.2	JS/MR meet to troubleshoot pdf-opening default (hampering review of exhibits)
9/22/2017	JF	0.5	MD/MS/AD/MR/JS/JF (Kellogg Litigation Team) Meet to plan trial and check-in on projects status (Mot. to Dismiss; Experts; Travel/Lodging; Witnesses; Exhibits; Depo designations; Mock Trial; Mots in Limine; Damages.
9/22/2017	MR	0.2	JS/MR meet to troubleshoot pdf-opening default (hampering review of exhibits)
9/22/2017	JF	0.1	Draft/send email to paralegals re request for sample cover letter
9/22/2017	MD	0.1	md/dg confer about DG ability to assist with writing projects and how to help to prepare for trial 0.1
9/22/2017	MR	2.9	Tag EARNs pay code negative payments to match up with positive payments (or if they match only partially or not at all)
9/22/2017	MS	1.1	research and memo on personal jurisdiction in light of Bristol Meyers
9/22/2017	MD	0.2	md/ms discuss responsibility about research needed to decide how to move forward with RSMs 0.2
9/22/2017	DG	2.5	md/dg confer about DG ability to assist with writing projects and how to help to prepare for trial 0.1; prepare brief re motion to strike defenses 2.4
9/22/2017	MS	0.2	md/ms discuss responsibility about research needed to decide how to move forward with RSMs 0.2
9/22/2017	MD	0.4	md/mr analyze pay data for application in damages 0.4
9/22/2017	MD	0.5	MD/MS/AD/MR/JS/JF (Kellogg Litigation Team) Meet to plan trial and check-in on projects status (Mot. to Dismiss; Experts; Travel/Lodging; Witnesses; Exhibits; Depo designations; Mock Trial; Mots in Limine; Damages.
9/22/2017	MS	0.5	MD/MS/AD/MR/JS/JF (Kellogg Litigation Team) Meet to plan trial and check-in on projects status (Mot. to Dismiss; Experts; Travel/Lodging; Witnesses; Exhibits; Depo designations; Mock Trial; Mots in Limine; Damages.
9/22/2017	MR	0.5	MD/MS/AD/MR/JS/JF (Kellogg Litigation Team) Meet to plan trial and check-in on projects status (Mot. to Dismiss; Experts; Travel/Lodging; Witnesses; Exhibits; Depo designations; Mock Trial; Mots in Limine; Damages.
9/22/2017	AD	0.5	MD/MS/AD/MR/JS/JF (Kellogg Litigation Team) Meet to plan trial and check-in on projects status (Mot. to Dismiss; Experts; Travel/Lodging; Witnesses; Exhibits; Depo designations; Mock Trial; Mots in Limine; Damages.
9/22/2017	MR	0.4	md/mr analyze pay data for application in damages 0.4



Date	Staff	Amount of Time	Description
9/22/2017	CM	0.4	JF/CM discuss workload and other concerns in preparation for trial
			Perform dtsearch research on email production to investigate the nature of EARNs pay
9/22/2017	MR	2.2	codes incidence 2.2
9/22/2017	JS	6.9	Add documents to exhibit list; gloss all docs with descriptions
9/22/2017	JF	0.2	MD/JF Check-in re the witness brochure project (trial preparation)
			jk Add topic on user defined functions to narrative explaining the damage calculation
9/22/2017	JK	1.6	process,
9/22/2017	JK	0.3	jk Respond to email from team regarding bonus codes
			md/ms confer on different options for calculating damages and presentation of FRE 1006
9/22/2017	MD	0.5	for variable labor rates in comparison to TM hourly rates 0.5
			MD/MS/AD/MR/JS/JF (Kellogg Litigation Team) Meet to plan trial and check-in on projects status (Mot. to Dismiss; Experts; Travel/Lodging; Witnesses; Exhibits; Depo
9/22/2017	JS	0.5	designations; Mock Trial; Mots in Limine; Damages.
9/22/2017	MD	0.2	MD/JF Check-in re the witness brochure project (trial preparation)
			jk Write first draft of user defined excel function which spreads bonuses in a monthly
9/22/2017	JK	2.8	fashion.
9/22/2017	JF	0.4	JF/CM discuss workload and other concerns in preparation for trial
9/22/2017	JK	0.3	jk Respond to email from team regarding class list items
			md/ms confer on different options for calculating damages and presentation of FRE 1006
9/22/2017	MS	0.5	for variable labor rates in comparison to TM hourly rates 0.5
9/22/2017	JK	1.9	jk Research the limitations of excel user defined functions
9/22/2017	JK	0.7	jk Learn how to use for each loops in excel VBA
			Continue text manipulation work on phone bill project: Pull dates from phone bill text
			2.2; Pull call times from phone bill text 1.8; Perform report formatting 1.0; Position
9/23/2017	MR	5.2	filename information .2
9/23/2017	JK	1.9	JK continue to research the abilities of excel user defined functions.
			Perform web research for video on preparing witness for trial .4; Email JS about ABA
9/23/2017	MR	0.5	video .1
			Context phone bill text manipulation project: Reformat phone numbers in program code
			so excel phone number formatting can be used 1.0; Create lookup to pull DM name
9/23/2017	MR	1.5	associated with phone number .5
			jk Use VBA to write user defined excel function which locates returns last row number of
9/24/2017	JK	1.8	an employee ID in an excel spreadsheet.
			jk Use VBA to write user defined excel function which locates the first row number of an
9/24/2017	JK	1.8	employee ID in an excel spreadsheet.
			jk Use VBA to write user defined excel function which counts all paychecks received in a
9/24/2017	JK	2.9	year and divides the sum of all earnings in that time period by the number of payments.
			jk begin writing a VBA user defined excel function to identify how payroll falls within the
9/24/2017	JK	1.9	4-4-5 week pay structure.
9/25/2017	JS	0.9	Proof and edit P Opp to Decertification Motion
9/25/2017	JF	0.2	Call with witness re intial trial preparation scheduling
9/25/2017	MR	1.5	Initial work on pulling witnesses' motus data from the various datasets
			Transfer home work files to server .1; Perform minor formatting changes .1; Catalog the
9/25/2017	MR	0.4	phone bill source data with some witness names .3
9/25/2017	MR	1.9	Continued work on pulling witnesses' motus data
			MD/JF Meet to discuss the process of assembling witness brochures (pre-trial
9/25/2017	JF	0.3	preparations)
			continue to work on compiling emails produced by defendants for each potential plaintiff
9/25/2017	ME	2.8	trial witness

Date	Staff	Amount of Time	Description
9/25/2017	MR	0.5	Finish EARNs negative amount tagging .5
9/25/2017	JK	1.7	JK GO back to original 6/2017 payroll data to match up with job history before payroll is spread into weeks.
9/25/2017	MR	0.1	MR/ME discuss process of obtaining gps information needed for each trial witness
9/25/2017	JK	1.3	jk Add functionality to user defined annual spread function to allow the user to input an optional variable which can control a static number of weeks to spread the earnings over.
9/25/2017	JS	0.1	MD/JK Locate and email tolling order
9/25/2017	JS	0.2	Identify and email list of hire/term dates to JK/Analytics for damage calculations
9/25/2017	MR	0.1	Email team about identifying witnesses' motus documents
9/25/2017	JS	0.2	locate and email tolling agreement for damages calculation
9/25/2017	JF	0.1	Call with opt-in re case update
9/25/2017	JS	0.3	Identify and locate exhibits for use in trial witness preparation package; send to JF
9/25/2017	ME	0.1	MR/ME discuss process of obtaining gps information needed for each trial witness
9/25/2017	JF	0.2	Call with opt-in re spike in compensation
9/25/2017	ME	0.2	ME/JF Check-in re workload/upcoming tasks
9/25/2017	MS	0.6	final revisions on opposition to motion to dismiss/decertify and pass to JS for formatting and filing
9/25/2017	JK	0.1	MD/JK Locate and email tolling order
9/25/2017	JK	0.3	MD/JK discuss spreading of bonuses in damage calculations.
9/25/2017	JS	0.1	Create Exhibit A to P Opp to Decertification Motion
9/25/2017	JK	1	JK Check other payroll production to see if there are any rows not included in the newest production .
9/25/2017	MD	0.3	MD/JK discuss spreading of bonuses in damage calculations.
9/25/2017	JS	0.6	Proof P Opp to D Motion to Decertify
9/25/2017	ME	0.2	MD/ME review status of project to compile plt trial witness emails .1; discuss best practice for moving forward with the project .1
9/25/2017	JS	0.3	Review PPT of hotel options, save in file
9/25/2017	JK	0.4	JK/MR/MD Discuss bonus pay spreading scenarios.
9/25/2017	JS	0.3	File P Opposition to Def Motion to Decertify Class
9/25/2017	JS	0.2	Locate and forward list of CTS dates for all opt-ins for damages process
9/25/2017	MD	0.2	MD/ME review status of project to compile plt trial witness emails .1; discuss best practice for moving forward with the project .1
9/25/2017	MS	0.2	email and call to M Subit re any comments on opposition to motion to dismiss/decertify
9/25/2017	JS	0.2	Locate and identify docket item with tolling stipulation; email to Analytics Team for damages calculations
9/25/2017	MD	0.4	JK/MR/MD Discuss bonus pay spreading scenarios.
9/25/2017	MR	0.1	Email JK and MD about EARNs negative payment coding
9/25/2017	MR	0.4	JK/MR/MD Discuss bonus pay spreading scenarios.
9/25/2017	JF	2.8	Edit/finalize documents that are going to be sent out to witnesses
9/25/2017	JS	0.4	MD/Js discuss exhibit list; next steps to refine
9/25/2017	JF	1.3	Begin the process of assembling the witness documents to be mailed out
9/25/2017	MS	0.3	review and revise motion to exclude experts
9/25/2017	JK	2.7	jk for each roll of payroll data matched with the corresponding payroll history row

Date	Staff	Amount of Time	Description
9/25/2017	JS	0.4	Call with Travel Agency with hotel bids for trial
9/25/2017	DG	2.7	draft motion in limine re privileged docs waived by defenses .7; legal research re same 2
9/25/2017	JF	0.2	JF/CM plan re-formatting of documents needed for witness packets
9/25/2017	MS	0.3	email to ET re repositioning argument re all TMs/RSRs being similarly situated
9/25/2017	MD	0.4	MD/Js discuss exhibit list; next steps to refine
9/25/2017	MR	0.2	Look for hire/term documents
9/25/2017	JK	1.3	jk Format payroll history in order to merge with payroll data
9/25/2017	MR	0.1	Fix shortcut referencing of email from Jim Boudreau about calculations
9/25/2017	MD	0.3	MD/JF Meet to discuss the process of assembling witness brochures (pre-trial preparations)
9/25/2017	JS	0.4	Call with Travel Agency with hotel bids for trial
9/25/2017	JK	1.1	jk import tolled consent to sue date into payroll history.
9/25/2017	JS	0.1	Create separate file folder for travel-related billing, add current invoices
9/25/2017	CM	3.1	re-format spreadsheets for witness preparation packets
9/25/2017	CM	0.2	JF/CM plan re-formatting of documents needed for witness packets
9/25/2017	JF	0.2	ME/JF Check-in re workload/upcoming tasks
9/25/2017	JS	0.1	Forward invoice from travel agency to CM for billing reconciliation purposes.
9/25/2017	MS	0.2	incorporate Exhibit A into opposition to motion to dismiss/decertify
9/25/2017	ME	1.7	compile documents to send to trial witnesses prior to their prep call
9/25/2017	MR	0.5	Research Kellogg FAFH (Food Away from Home) designation .4; Email MD and JK about FAFH .1
9/26/2017	MR	0.2	MR/ME review project to compile emails produced by defendants' for each trial witness to determine best practices for continuing the project
9/26/2017	CLER	0.5	prepare documents for client .30 prepare mailing of documents .20
9/26/2017	ME	4.9	continue to work on compiling emails produced by defendants for each potential plaintiff trial witness
9/26/2017	ME	0.2	ME/JF Check-in re workload (trial preparations)
9/26/2017	MD	0.3	MD/MR/ME develop clear strategy for working with emails produced by defendants for each plaintiff trial witness
9/26/2017	MR	0.3	MD/MR/ME develop clear strategy for working with emails produced by defendants for each plaintiff trial witness
9/26/2017	ME	0.2	MR/ME review project to compile emails produced by defendants' for each trial witness to determine best practices for continuing the project
9/26/2017	MR	3.4	Create revision of Excel workbook containing of witnesses' Motus data for easier use by paralegals 1.7; Create source explanation sheet of workbook 1.5; Compose email with detailed explanation .2
9/26/2017	ME	0.3	MD/MR/ME develop clear strategy for working with emails produced by defendants for each plaintiff trial witness
9/26/2017	JF	0.2	ME/JF Check-in re workload (trial preparations)
9/26/2017	JS	0.2	JS/JF Meet to discuss potential changes/revisions to cover letter to be mailed out to trial witnesses
9/26/2017	CLER	0.9	prepare mailing of document for clients review (trial material)
9/26/2017	AG	0.3	AG/JF Meet to discuss the process to mail out documents to witnesses
9/26/2017	JF	0.2	JS/JF Meet to discuss potential changes/revisions to cover letter to be mailed out to trial witnesses
9/26/2017	AN	0.2	JK/MD/(AN.2) Check in on progress of damage calculations
9/26/2017	MD	0.5	JK/MD/(AN.2) Check in on progress of damage calculations
9/26/2017	JS	1.8	Proof P Mot to Exclude; format, add ToC and ToA
9/26/2017	JF	0.3	AG/JF Meet to discuss the process to mail out documents to witnesses

Date	Staff	Amount of Time	Description
9/26/2017	ME	0.6	search defendants' email discovery production for potential trial exhibits
			Continue the process to assemble witness documents in order to mail them out to
9/26/2017	JF	4.9	witnesses
9/26/2017	JK	0.5	JK/MD/(AN.2) Check in on progress of damage calculations
9/26/2017	JK	2.2	JK Isolate payroll for all job titles that should be included in the damages.
			MD/ME review potential trial exhibits to locate via search of defendants' email discovery
9/26/2017	MD	0.2	production
9/26/2017	MD	0.1	MD/JF Meet re changes to the documents to be sent out to witnesses
9/26/2017	CLER	0.5	prepare documents for client .30 prepare mailing of documents .20
9/26/2017	JS	0.5	Revise P Mot to Exclude D Expert Testimony
9/26/2017	DG	3.4	draft motion to compel/strike defenses 2.5; legal research re same .9
9/26/2017	JS	0.4	Create exhibits to Motion to exclude
9/26/2017	JS	0.3	JS/MD meet to discuss cover letter and documents sending to plt witnesses
			Transfer documents recd from ECF system to docket file and create file copy (Docket#441
9/26/2017	CLER	0.1	P Opp to D Mot to Decert)
9/26/2017	MD	0.3	JS/MD meet to discuss cover letter and documents sending to plt witnesses
9/26/2017	JS	0.4	Revise cover letter to reflect changes discussed with team
			MD/ME review potential trial exhibits to locate via search of defendants' email discovery
9/26/2017	ME	0.2	production
9/26/2017	MR	2.2	Complete pulling of witnesses' motus data in source sheets in Excel workbook
9/26/2017	JK	0.8	JK Import all prize fringe deductions into payroll data
9/26/2017	JS	0.4	review exhibit procedure for Judge Leighton
9/26/2017	JK	2.2	JK create lookup table between payroll history and earning statements.
9/26/2017	JF	0.1	MD/JF Meet re changes to the documents to be sent out to witnesses
			JK Determine which rows of payroll fall within the statue of limitations for each opt-ins
9/26/2017	JK	0.8	tolled consent to sue date.
			JK Identify issue where overtime payments are showing up in payroll for weeks where
9/26/2017	JK	1.8	employees are designated as exempt.
			JK Extract all hire and termination dates from the payroll/history matchup and compare
9/27/2017	JK	0.9	them to the current list
9/27/2017	ME	1.4	search defendants' email discovery production for potential trial exhibits
9/27/2017	JS	0.3	Email to Harbor Home Rentals re: house lease
			JK Determine what rows of work history are present in the 10/2015 work history
9/27/2017	JK	2.4	production that do no appear in the 3/2017 production
9/27/2017	ME	0.7	search defendants' email discovery production for potential trial exhibits
9/27/2017	MD	0.1	JS/MD discuss exhibits: process for submission; procedure during trial
9/27/2017	JS	0.1	JS/MD discuss exhibits: process for submission; procedure during trial
9/27/2017	MD	0.2	JS/MD discuss travel rental options for trial
9/27/2017	JS	0.2	JS/MD discuss travel rental options for trial
9/27/2017	JF	0.1	Call to witness re travel information communication
			MD/ME review project of cross checking pay data to assist attorneys and analytics with
9/27/2017	MD	0.1	damage prep for trial
9/27/2017	JF	0.1	Call to witness re travel information communication
			JK match up payroll history to check by check earnings data with offset for the delay
9/27/2017	JK	1.4	between the work week and check date.
9/27/2017	ME	0.1	respond to opt-in's email requesting case update
9/27/2017	ME	0.5	cross check pay data to assist attorneys and analytics with damage prep for trial
9/27/2017	ME	1.2	search defendants' email discovery production for potential trial exhibits
			JK Create summary spreadsheet of all incorrect overtime payments seen in the payroll
9/27/2017	JK	1.6	history matchup.

Date	Staff	Amount of Time	Description
9/27/2017	CLER	1.1	prepare mailing of document for clients review (trial material)
9/27/2017	MD	0.3	md/dg discuss good faith and willfulness defense - brief to compel and overall trial strategy connection .3
9/27/2017	ME	0.1	MD/ME review project of cross checking pay data to assist attorneys and analytics with damage prep for trial
9/27/2017	JK	1.7	JK Attempt to reconcile the work history in the 10/2015 work history production that do no appear in the 3/2017 production
9/27/2017	MR	0.2	JK/MR confer about extrapolations aspect of damages
9/27/2017	JF	0.6	Outreach to witnesses re their participation in the trial
9/27/2017	DG	0.3	md/ms strategize re proving up willfulness at trial 0.3
9/27/2017	MD	0.3	md/ms strategize re proving up willfulness at trial 0.3
9/27/2017	JF	4.8	Assemble electronic copies of document packets for witnesses (trial preparations)
9/27/2017	JK	0.2	JK/MR confer about extrapolations aspect of damages
9/27/2017	JS	0.5	Research additional options for possible mock trial
9/27/2017	JF	0.3	JF/CM plan process for producing witness packets
9/27/2017	CM	0.2	reformat spreadsheet for printing for witness
9/27/2017	MR	0.2	Send to team an email from Defense Counsel in 2015 about Route Sales Rep .2
9/27/2017	ME	0.8	search defendants' email discovery production for potential trial exhibits
9/27/2017	CM	0.3	JF/CM plan process for producing witness packets
9/27/2017	JK	0.2	JK/MR confer about overtime payments that appear for exempt positions
9/27/2017	JS	0.1	Email mock-trial provider for quote
9/27/2017	CM	4.5	prepare trial preparation packets for plaintiff witnesses
9/27/2017	DG	3.9	md/dg discuss good faith and willfulness defense - brief to compel and overall trial strategy connection .3; draft motion to compel or strike defenses 3.6
9/27/2017	MR	0.2	JK/MR confer about overtime payments that appear for exempt positions
9/27/2017	JK	0.4	JK/MD Review progress of damage calculations, highlighting issue of overtime that appear for job titles that are exempt.
9/27/2017	MD	0.4	JK/MD Review progress of damage calculations, highlighting issue of overtime that appear for job titles that are exempt.
9/28/2017	MD	0.2	MD/JF Discuss the process of selecting Motus data for individual witnesses
9/28/2017	JS	0.4	Additional edits to brief prior to filing
9/28/2017	JF	0.2	MD/JF Discuss the process of selecting Motus data for individual witnesses
9/28/2017	MR	0.1	MD/DG/MR discuss language on how biweekly wages are computed
9/28/2017	JK	1.1	JK Prepared payroll to be spread from biweekly pay periods into weekly pay periods.
9/28/2017	JS	0.4	Refine exhibits per MD instruction
9/28/2017	JK	2.2	JK Fixed issues in yearly spread program for extreme cases where calculations were not reported correctly.
9/28/2017	JF	0.3	MR/JF Discuss the status of damage calculations for opt-ins
9/28/2017	MD	0.1	MD/AN Discuss search for payroll data for plaintiffs that was not provided from Defendant
9/28/2017	ME	0.9	organize hard copies of deposition exhibit files
9/28/2017	CLER	1	prepare mailing of document for clients review (trial material)
9/28/2017	ME	3.6	compile deposition exhibits for potential trial witnesses to send for their review during trial preparation call
9/28/2017	JK	1.8	JK Verified that yearly spread program works correctly
9/28/2017	AN	0.1	MD/AN Discuss search for payroll data for plaintiffs that was not provided from Defendant

Date	Staff	Amount of Time	Description
9/28/2017	JK	1.7	JK Verify program used to spread payroll matching Kellogg's 4-4-5 schedule calculates the periods correctly.
9/28/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#442 - P. MOTION to Exclude Testimony Of Defendants Experts)
9/28/2017	JF	0.1	Send email to JS re travel
9/28/2017	MD	0.1	MD/DG/MR discuss language on how biweekly wages are computed
9/28/2017	JF	0.2	MD/JF Check-in re workload/packets to witnesses that need to be mailed out by the beginning and the end of next week
9/28/2017	AG	0.2	ECF Filing of P. MOTION to Exclude Testimony Of Defendants Experts
9/28/2017	DG	0.1	MD/DG/MR discuss language on how biweekly wages are computed
9/28/2017	MR	0.3	MR/JF Discuss the status of damage calculations for opt-ins
9/28/2017	JK	1.4	JK Devise method for spreading bonuses correctly to match Kellogg business's year.
9/28/2017	JF	0.3	ME/JF Discuss the task to assemble deposition exhibits for witnesses
9/28/2017	MD	0.2	MD/JF Check-in re workload/packets to witnesses that need to be mailed out by the beginning and the end of next week
9/28/2017	JF	0.7	ME/JF Collaborate to assemble deposition exhibits for trial witnesses who were deposed previously
9/28/2017	ME	0.3	ME/JF Discuss the task to assemble deposition exhibits for witnesses
9/28/2017	JS	0.8	Create exhibits for Mot to exclude, redact confidential material; create separate version to file under seal.
9/28/2017	JS	0.5	Perform additional edits to P Mot to Exclude D Expert Testimony
9/28/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#443 - UNREDACTED SEALED [442] MOTION to Exclude Testimony Of Defendants Experts)
9/28/2017	AG	0.1	ECF Filing of UNREDACTED SEALED [442] MOTION to Exclude Testimony Of Defendants Experts
9/28/2017	JF	4.2	Analyze/assemble motus data for witnesses who were deposed previously (the process to assemble witness packets; trial preparation)
9/28/2017	ME	0.7	ME/JF Collaborate to assemble deposition exhibits for trial witnesses who were deposed previously
9/29/2017	MR	0.2	JK/MR discuss handling of extrapolations in relation to job history
9/29/2017	JF	0.1	ME/JF Check-in re the preparation of deposition exhibits
9/29/2017	ME	0.1	ME/JF Check-in re the preparation of deposition exhibits
9/29/2017	JS	0.1	Updated contact information per client email
9/29/2017	JS	0.2	Review and forward house rental contract
9/29/2017	JS	1.2	Research exhibit process and procedures
9/29/2017	JF	0.1	Send out email notification about Kellogg team meeting
9/29/2017	MD	0.5	JK/MD Daily check in on damage calculation progress about about payroll hours that do not equal 80 for salaried employees in random work periods.
9/29/2017	JK	0.3	JK/MD Phone call to discuss the spread of PTO
9/29/2017	JF	1.5	Litigation team meet (JS/MD/JF/ME) to discuss trial preparation; damages; travel;witnesses; exhibits; depo designations; mock trial planning; upcoming motions; damages; work conflicts; bifurcating claims.
9/29/2017	ME	1.5	Litigation team meet (JS/MD/JF/ME) to discuss trial preparation; damages; travel;witnesses; exhibits; depo designations; mock trial planning; upcoming motions; damages; work conflicts; bifurcating claims.
9/29/2017	MD	1.5	Litigation team meet (JS/MD/JF/ME) to discuss trial preparation; damages; travel;witnesses; exhibits; depo designations; mock trial planning; upcoming motions; damages; work conflicts; bifurcating claims.



Date	Staff	Amount of Time	Description
9/29/2017	JF	0.1	jf/dg discuss how to use motus data with clients .1
9/29/2017	DG	0.1	jf/dg discuss how to use motus data with clients .1
9/29/2017	JK	0.5	JK/MD Daily check in on damage calculation progress about about payroll hours that do not equal 80 for salaried employees in random work periods.
9/29/2017	MD	0.1	MD/JF Brief check-in re trial preparations
9/29/2017	ME	4.2	compile deposition exhibits for potential trial witnesses to send for their review during trial preparation call
9/29/2017	JF	5.1	Prepare document packets for witnesses
9/29/2017	JF	0.1	MD/JF Brief check-in re trial preparations
9/29/2017	JS	1.5	Litigation team meet (JS/MD/JF/ME) to discuss trial preparation; damages; travel;witnesses; exhibits; depo designations; mock trial planning; upcoming motions; damages; work conflicts; bifurcating claims.
9/29/2017	JS	0.1	Email to opt-in re: updated address
9/29/2017	JK	0.2	JK/MR discuss handling of extrapolations in relation to job history
9/29/2017	JS	0.1	Leave message for Travel Leaders re: hotel choices
9/29/2017	MD	0.3	JK/MD Phone call to discuss the spread of PTO
9/29/2017	JK	1.7	JKCreate a breakdown of all the hours displayed in Kellogg's payroll for regular pay
9/29/2017	JK	1.7	JKCreate a breakdown of all the hours displayed in Kellogg's payroll for payment types designated as PTO.
9/29/2017	JS	3.6	Exhibit list--assemble documents
9/29/2017	JK	2.2	JK Identify and fix bug in excel user defined function which was incorrectly spreading yearly payroll data.
9/29/2017	JK	1.5	JK Create analysis of all weeks where hours do not equal 40.
10/2/2017	ME	0.2	MR/ME discuss process of copying deposition exhibit files to cd to send to trial witnesses to review for trial preparation meeting with attorney
10/2/2017	JK	0.5	JK Investigate any remaining weeks in the payroll and history matchup that are tagged with a weekly pay value in the payment frequency column.
10/2/2017	MS	2	review and designate Nilles deposition
10/2/2017	JF	0.2	ME/JF Check-in re PLT itineraries
10/2/2017	ME	0.2	compile list of opt-ins who worked in particular sales territory to assist attorneys with trial preparation
10/2/2017	ME	1.2	copy deposition exhibit files to cd to send to trial witnesses to review for trial preparation meeting with attorney
10/2/2017	MD	2.5	edit jury instructions 2.5
10/2/2017	MS	0.2	md/ms confer re how to handle response re McCartt's attorney's email 0.2
10/2/2017	JS	0.2	Email Shea at Pipeline Recruiting; update on decision re: mock trial
10/2/2017	JF	4.8	Prepare document packets for witnesses
10/2/2017	ME	0.4	Read Defendants' Reply in Support of Defendants' Motion to Dismiss Out-of-State Opt-ins Based on New Supreme Court Case and to Decertify FLSA Collective Action Based on Smith v. Kellogg and Absence of Expert Testimony
10/2/2017	MD	0.2	md/ms confer re how to handle response re McCartt's attorney's email 0.2
10/2/2017	MS	0.3	MD/MS discuss designation testimony regarding Kellogg's characterization of sales
10/2/2017	MD	0.3	MD/MS discuss designation testimony regarding Kellogg's characterization of sales
10/2/2017	JF	0.1	MD/JF Check-in re recent witness interviews
10/2/2017	MD	2.5	speak with client to prep for trial 2.5
10/2/2017	CM	1.4	prepare witness packets

Date	Staff	Amount of Time	Description
10/2/2017	ME	2.3	compile deposition exhibits for potential trial witnesses to send for their review during trial preparation call
10/2/2017	ME	0.5	copy deposition exhibit files to cd to send to trial witnesses to review for trial preparation
10/2/2017	MD	1	meeting with attorney
10/2/2017	JF	0.1	edit statement of facts 1.0
10/2/2017	JF	0.2	CM/JF Check-in re process of itinerary production for witness
10/2/2017	MD	0.5	ME/JF Check-in re production of documents (trial witness brochure)
10/2/2017	MD	0.1	prep for call with client re trial 0.5
10/2/2017	ME	0.8	MD/JF Check-in re recent witness interviews
10/2/2017	MD	2	copy deposition exhibit files to cd to send to trial witnesses to review for trial preparation
10/2/2017	CM	3.3	meeting with attorney
10/2/2017	CM	3.3	insert case citations to jury instructions
10/2/2017	CM	3.3	re-format itineraries for witness packets 1.3, prepare witness packets 1.8, prepare folder for MD of documents common to all witness packets .2
10/2/2017	JF	0.2	Respond to emails from trial witnesses (re travel and pre-trial document packet)
10/2/2017	CM	0.1	CM/JF Check-in re process of itinerary production for witness
10/2/2017	ME	0.2	ME/JF Check-in re production of documents (trial witness brochure)
10/2/2017	MD	2	prepare for trial 2.0
10/2/2017	CLER	1	prepare mailing of document for clients review (trial material)
10/2/2017	MD	0.5	call with client about testifying for trial 0.5
10/2/2017	ME	0.1	email link to opt-in paystubs to JK for damages purposes
10/2/2017	MR	0.2	MR/ME discuss process of copying deposition exhibit files to cd to send to trial witnesses
10/2/2017	JS	6.4	to review for trial preparation meeting with attorney
10/2/2017	ME	0.2	Assemble exhibit list based on proof chart
10/2/2017	JK	1.8	ME/JF Check-in re PLT itineraries
10/2/2017	MD	0.5	JK Devise methodology to spread the payroll from biweekly
10/2/2017	JF	0.1	review data to provide JK for damage calculations 0.5
10/2/2017	JS	1.2	ME/JF Check-in re assembly of deposition exhibits
10/2/2017	MD	0.4	Burn 6 copies of safety video for opt-in review prior to trial
10/2/2017	MR	3.5	0.4 call with client about testifying at trial 0.4
10/2/2017	JK	2.5	Examine email forwarded by MD from Defendant regarding Kellogg's list of 99 opt-ins claimed by Kellogg to not have claims .1; Reply to team regarding some of the reps named in list .1; Add unique identifiers to "list of 99" .3; Read/reply to email from MS about "list of 99" .1; Create excel sheet listing 20 opt-ins who have claims and 79 opt-ins who do not 2.7; Send follow-up email with more info about list of 99 .1; Send 2nd follow-up email with link to workbook listing list of 20 and list of 79 .1
10/2/2017	ME	1.1	JK execute annual spread of appropriate bonuses over the biweekly pay data.
10/2/2017	MS	2.1	copy deposition exhibit files to cd to send to trial witnesses to review for trial preparation
10/2/2017	JS	0.2	meeting with attorney
10/2/2017	CLER	0.1	designating O'Connell depo
10/2/2017	ME	0.1	Email to opt-in regarding travel plans
10/2/2017	MS	2.3	Transfer documents recd from ECF system to docket file and create file copy (Docket#444)
10/2/2017	MR	0.2	D. REPLY TO RESPONSE to [439] MOTION to Dismiss)
10/2/2017	ME	0.1	ME/JF Review the process by which the exhibits are to be saved on the disc (per document volume specifications)
10/2/2017	MS	2.3	designate Reed depo for trial
10/2/2017	MR	0.2	Use DTSearch to confirm that Kellogg Sales Rep Walmart is in Morning Foods division

Date	Staff	Amount of Time	Description
10/2/2017	JK	1.4	JK Qualify results of bi-weekly to weekly spread of data.
10/2/2017	CM	0.3	JF/CM plan next steps in preparation of witness packets
10/2/2017	MS	0.2	review Kellogg Reply to Motion to Dismiss/Decertify and forward to group
10/2/2017	JF	0.3	JF/CM plan next steps in preparation of witness packets
10/2/2017	MD	0.2	email defense counsel about meeting for pre-trial filing 0.2
10/2/2017	JF	0.1	ME/JF Review the process by which the exhibits are to be saved on the disc (per document volume specifications)
10/2/2017	JK	1.2	JK Execute spread of weeks from biweekly to weekly.
10/2/2017	ME	0.1	ME/JF Check-in re assembly of deposition exhibits
10/2/2017	MD	0.2	email team about strategy to deal with various motions 0.2
10/3/2017	JF	0.2	ME/JF Check-in re the process of assembly of witness packets
10/3/2017	AN	0.1	MD/AN Discuss search for documentation explaining reason for missing weeks of payroll for multiple plaintiffs
10/3/2017	CM	0.2	CM/JF Check-in re the process of printing the witness packets
10/3/2017	JF	0.5	JF/ME explain task of compiling documents to send to witnesses for trial preparation call with attorney
10/3/2017	JS	0.5	Call with John Ryan from Strategic Research re: mock trial
10/3/2017	AN	1	Research all data on file to identify reasons for missing payroll for multiple plaintiffs
10/3/2017	JS	0.3	Call with Michael Subit's paralegal re: Tacoma set up and technology training.
10/3/2017	JS	5.9	Review exhibits and add Bates ranges to exhibit list
10/3/2017	AN	0.1	ME/AN Discuss spreadsheet from Kellogg listing personnel actions for plaintiffs
10/3/2017	MS	0.4	ET/MS call re addressing Kellogg's changing argument in its reply ISO its motion to dismiss/decertify
10/3/2017	ME	0.2	ME/JF Check-in re the process of assembly of witness packets
10/3/2017	MD	0.7	drafting explanation for ET re damages 0.7
10/3/2017	JS	0.3	JS/MA discuss trial preparation issues; exhibit management; logistics; best practices
10/3/2017	JF	0.2	Speak with opt-in re case update
10/3/2017	MD	3	preparing for trial 3.0
10/3/2017	MD	0.1	MD/AN Discuss search for documentation explaining reason for missing weeks of payroll for multiple plaintiffs
10/3/2017	MS	0.1	email to ET re sur reply to Kellogg's motion to dismiss/decertify
10/3/2017	CM	2.4	prepare witness packets
10/3/2017	MS	3.1	designate Kelly transcript
10/3/2017	JF	0.2	CM/JF Check-in re the process of printing the witness packets
10/3/2017	ME	4.7	compile documents to send to witnesses for trial preparation
10/3/2017	JS	0.3	Call with Judge Leighton's deputy re: trial procedures and preferences, technology training, etc.
10/3/2017	ME	0.1	ME/AN Discuss spreadsheet from Kellogg listing personnel actions for plaintiffs
10/3/2017	MS	0.1	email to MD re sur reply to Kellogg's motion to dismiss/decertify
10/3/2017	ME	0.5	JF/ME explain task of compiling documents to send to witnesses for trial preparation call with attorney
10/3/2017	MS	0.2	md/ms confer re ET draft sur-reply re damages 0.2
10/3/2017	CM	1.3	prepare witness preparation packets
10/3/2017	JF	0.1	MD/JF Check-in re individual availability of plaintiffs/recording of potential witness pushbacks
10/3/2017	MR	0.5	read/reply to email from ME about # of opt-ins from each division per region .1; locate prior report relevant to ME email .2; make slight adjustments to report .2

Date	Staff	Amount of Time	Description
10/3/2017	CM	0.2	CM/JF Check-in re brochure packets
10/3/2017	MD	0.2	md/ms debate method to calculate PTO for damages 0.2
10/3/2017	ME	0.4	search defendants' discovery production for potential trial exhibits
10/3/2017	JF	0.2	CM/JF Check-in re witness brochure packets
10/3/2017	MS	0.2	md/ms debate method to calculate PTO for damages 0.2
10/3/2017	AD	1.9	Research case law concerning subpoena power to out of state witnesses 1.9
			copy deposition exhibit files to cd to send to trial witnesses to review for trial preparation
10/3/2017	ME	0.6	meeting with attorney
10/3/2017	CLER	1.1	prepare mailing of document for clients review (trial material)
10/3/2017	MS	0.1	review Kellogg reply to motion to dismiss/decertify in preparation for call with Ed
10/3/2017	JS	0.2	Call with Andrea from Travel Leaders--discuss hotel rate and offered package
10/3/2017	JF	3.2	Prepare witness packets to be sent out to trial witnesses
10/3/2017	MR	0.1	Send email to JK and MD regarding reminder to build in severance aspect to damages
10/3/2017	MA	0.3	JS/MA discuss trial preparation issues; exhibit management; logistics; best practices
10/3/2017	MR	0.1	Send follow-up email to team about Kellogg 99 list
10/3/2017	MS	0.2	draft email to McCartt counsel re testimony
			Read/reply to email from MD regarding 79 reps outside of SOL .1; revise list of 79 opt-ins
10/3/2017	MR	0.9	to identify pled states of employment .8
10/3/2017	MD	0.2	md/ms confer re ET draft sur-reply re damages 0.2
			MD/JF Check-in re individual availability of plaintiffs/recording of potential witness
10/3/2017	MD	0.1	pushbacks
10/3/2017	MD	2.5	review exhibits for trial 2.5
10/3/2017	JF	0.1	Respond to witness re travel arrangements
10/4/2017	MD	1.5	edit statement of facts for trial 1.5
			CM/ME review how to print itineraries for trial witness packets .2; review process of
10/4/2017	CM	0.3	assembling trial witness packets .1
10/4/2017	ME	0.7	compile documents to send to witnesses for trial preparation
10/4/2017	CM	5.9	prepare witness packets
			CM/ME review how to print itineraries for trial witness packets .2; review process of
10/4/2017	ME	0.3	assembling trial witness packets .1
10/4/2017	ME	2.9	compile documents to send to witnesses for trial preparation
10/4/2017	ME	0.3	locate deposition exhibits per attorney's request for trial preparation
10/4/2017	MS	1	designating Pennington deposition transcript
10/4/2017	AD	0.7	Draft research memo .7
			md/ms strategize re various topics to discuss with defense counsel during phone call
10/4/2017	MS	1	tomorrow 1.0
10/4/2017	MS	0.2	MD/MS discuss import of Kaminiski testimony on Plaintiffs' theory
10/4/2017	JS	1.3	Research possible providers/facilitators for mock trial
10/4/2017	MR	0.1	MR/JF/CM review method of formatting motus data
10/4/2017	MS	3.6	designating two Kaminski transcripts for pre-trial order
10/4/2017	JF	4.8	Assembly of packets/data for trial witnesses
10/4/2017	MS	0.5	revise FWW section of draft of motion for trial order on damages and FWW
10/4/2017	CM	0.1	MR/JF/CM review method of formatting motus data
10/4/2017	JF	0.1	MR/JF/CM review method of formatting motus data
10/4/2017	JF	0.1	JF/CM make plans for continued work on witness packets
10/4/2017	ME	0.2	JF/ME discuss status of preparing witness packets for trial

Date	Staff	Amount of Time	Description
10/4/2017	JS	3.6	Review exhibits, add Bates ranges to index, perform OCR on non-compliant pdfs
10/4/2017	JK	0.5	JK/MS discuss how to include PTO in damage calculations
10/4/2017	MS	0.5	JK/MS discuss how to include PTO in damage calculations
10/4/2017	ME	1	compile documents to send to witnesses for trial preparation
10/4/2017	JS	0.3	Email three possible mock-trial providers for estimates and packages
10/4/2017	MD	1	md/ms strategize re various topics to discuss with defense counsel during phone call tomorrow 1.0
10/4/2017	MD	0.2	MD/MS discuss import of Kaminiski testimony on Plaintiffs' theory
10/4/2017	CLER	1.3	prepare mailing of document for clients review (trial material) Compose email to analytics department with links to new information added to spreadsheet showing data on file to identify reasons for missing payroll for multiple
10/4/2017	AN	0.3	plaintiffs
10/4/2017	JF	0.2	JF/ME discuss status of preparing witness packets for trial
10/4/2017	MS	1	review and revise ET brief on Case Mgt Order for damages
10/4/2017	AN	1	Research all data on file to identify reasons for missing payroll for multiple plaintiffs
10/4/2017	CM	0.1	JF/CM make plans for continued work on witness packets
10/5/2017	AG	0.1	Decertify re [439] MOTION
10/5/2017	JF	0.3	ME/JF Check-in re production of witness packets (pre-trial preparation)
10/5/2017	MD	0.2	md/ms digest results of call with defense counsel 0.2
10/5/2017	JF	1.7	Prepare Motus data to be included in the witness packets
10/5/2017	CLER	0.6	create PDF format of deposition transcripts Transfer documents recd from ECF system to docket file and create file copy (Docket#446 - P. MOTION to Consider Doc 445 as a Sur-Reply to Defendants Motion to Decertify re
10/5/2017	CLER	0.1	[439] MOTION to Dismiss
10/5/2017	ME	0.3	ME/JF Check-in re production of witness packets (pre-trial preparation) Review and edit brief re damage calculations; format; generate Table of Contents and
10/5/2017	JS	1.9	Table of Authorities
10/5/2017	JF	0.3	MR/JF Preparation of opt-in spreadsheet for 2nd round of potential witness outreach
10/5/2017	MS	0.6	revise motion for surreply re motion to dismiss/decertify
10/5/2017	MS	0.7	md/ms confer with defense counsel about various trial issues 0.7
10/5/2017	MS	0.2	md/ms digest results of call with defense counsel 0.2
10/5/2017	MD	0.7	md/ms confer with defense counsel about various trial issues 0.7
10/5/2017	JS	0.1	Review and forward email from opt-in witness.
10/5/2017	MS	0.2	draft proposed order for case mgt motion
10/5/2017	ME	3.3	compile documents to send to witnesses for trial preparation
10/5/2017	ME	0.2	ME/JF Check-in re production of witness packets jk Go back to original payroll and re -convert all of it, not just the weeks in the statute of
10/5/2017	JK	1.6	limitation to weeks to capture any bonuses that need to be spread.
10/5/2017	MD	1.5	editing motion to exclude Kellogg's state of mind defenses 1.5
10/5/2017	MS	0.2	develop system for preserving and storing designated deposition transcripts
10/5/2017	AN	0.1	JK/AN Discuss spreadsheet with documentation for missing payroll weeks for multiple clients
10/5/2017	JF	2.6	Outreach to MF opt-ins from Central/Eastern Region
10/5/2017	AG	0.2	ECF Filing of MOTION for Court to Calculate Damages Based on Jury Verdict Transfer documents recd from ECF system to docket file and create file copy (Docket#445
10/5/2017	CLER	0.1	- MOTION for Court to Calculate Damages Based on Jury Verdict

Date	Staff	Amount of Time	Description
10/5/2017	MD	0.5	review additional witnesses to testify at trial 0.5
10/5/2017	MS	0.1	AG/MS discuss scanning and production of designated deposition transcripts
			Assemble exhibits for review; annotate spreadsheet with Bates ranges for documents; perform OCR on documents in order to comply with court evidence/exhibit requirements.
10/5/2017	JS	4.2	
10/5/2017	MS	0.4	review and revise case mgt motion
10/5/2017	CLER	0.2	create PDF format of documents recd from client
10/5/2017	MD	2	edit motion re exclude state of mind defenses 2.0
10/5/2017	MR	0.1	Send email to MS and AG regarding color laser purchase
10/5/2017	JF	0.2	ME/JF Check-in re production of witness packets
10/5/2017	JS	0.6	Review and edit Motion to Consider [455] as sur-reply; format. Add certificate of service.
10/5/2017	MS	0.6	revise motion to consider a surreply to motion to dismiss/decertify
10/5/2017	JF	0.4	JS/JF Check-in re the trial process
			JK/AN Discuss spreadsheet containing documentation explaining weeks of missing payroll
10/5/2017	AN	0.1	for plaintiffs
10/5/2017	MS	0.2	draft proposed order for srureply motion
10/5/2017	JF	0.1	MD/JF Check-in re witness outreach (MF division)
10/5/2017	MR	0.3	MR/JF Preparation of opt-in spreadsheet for 2nd round of potential witness outreach
10/5/2017	CLER	0.5	prepare mailing of document for clients review (trial material)
10/5/2017	MR	0.4	Research into getting color laser printer for trial submissions with highlighting
			JK/AN Discuss spreadsheet containing documentation explaining weeks of missing payroll
10/5/2017	JK	0.1	for plaintiffs
10/5/2017	MA	0.5	assist JS in fixing table of contents for case management motion
10/5/2017	JS	0.4	Create Exhibits for motion in support of damage calculations
10/5/2017	MD	0.1	MD/JF Check-in re witness outreach (MF division)
10/5/2017	JS	0.4	JS/JF Check-in re the trial process
10/5/2017	MS	3	designate Pennington's two deposition transcripts for trial
10/5/2017	JF	0.8	MS/MD/AD/ME/JS/JF/JK (in part) Kellogg weekly team meeting
			JK/AN Discuss spreadsheet with documentation for missing payroll weeks for multiple
10/5/2017	JK	0.1	clients
10/5/2017	ME	3.7	prepare witness packets for trial preparation
10/5/2017	MD	0.8	MS/MD/AD/ME/JS/JF/JK (in part) Kellogg weekly team meeting
10/5/2017	AG	0.1	AG/MS discuss scanning and production of designated deposition transcripts
			AG/MR discuss benefit and savings of getting color laser printer for trial submissions vs
10/5/2017	MR	0.1	using outside copy shop
10/5/2017	MS	0.8	MS/MD/AD/ME/JS/JF/JK (in part) Kellogg weekly team meeting
			jk Take original payroll and correctly combine it into the biweekly periods for each work
10/5/2017	JK	2.2	week.
10/5/2017	MD	0.2	prepare for meeting with team 0.2
10/5/2017	AD	0.8	MS/MD/AD/ME/JS/JF/JK (in part) Kellogg weekly team meeting
10/5/2017	ME	0.8	MS/MD/AD/ME/JS/JF/JK (in part) Kellogg weekly team meeting
10/5/2017	JK	0.3	MS/MD/AD/ME/JS/JF/JK (in part) Kellogg weekly team meeting
10/5/2017	JS	0.8	MS/MD/AD/ME/JS/JF/JK (in part) Kellogg weekly team meeting
			AG/MR discuss benefit and savings of getting color laser printer for trial submissions vs
10/5/2017	AG	0.1	using outside copy shop
			jk Spread AIP annual bonus over entire set of produced payroll, not just the weeks in the
10/5/2017	JK	2.6	statue of limitation to weeks to capture any bonuses that need to be spread.



Date	Staff	Amount of Time	Description
10/5/2017	JK	1.6	jk Spread Monthly Bonus/ Commissions over entire set of produced payroll, not just the weeks in the statue of limitation to weeks to capture any bonuses that need to be spread.
10/6/2017	JK	1.5	JK Create a damage model which can be used to ascertain overtime damages based on hybrid methodology between overtime calculation methods.
10/6/2017	ME	0.1	MD/ME review document needed to locate as potential trial exhibit
10/6/2017	MD	0.2	MD/JF Check-in re MF division outreach for potential witnesses
10/6/2017	JF	0.8	Outreach to opt-ins re KSR-Walmart responsibilities vs TM-DSD responsibilities
10/6/2017	MD	3	preparing for trial 3.0
10/6/2017	MD	0.1	MD/ME review document needed to locate as potential trial exhibit
10/6/2017	JF	1.6	Review/update the master witness spreadsheet with relevant information re industrial studies opt-in participation
10/6/2017	JK	1.5	JK Create a damage model which can be used to ascertain overtime damages based on the half time method of damage calculations
10/6/2017	JF	0.2	MD/JF Check-in re MF division outreach for potential witnesses
10/6/2017	MD	0.3	amend initial disclosures 0.3
10/6/2017	MD	0.5	edit motion to strike defenses 0.5
10/6/2017	CM	3.5	prepare witness packets
10/6/2017	ME	0.8	compile documents to send to witnesses for trial preparation
10/6/2017	MS	0.2	md/ms confer about conversation to have with clients who participated in industrial studies 0.2
10/6/2017	MS	0.1	MS/JF Task to outreach opt-ins shadowed during the industrial studies to set up attorney interview
10/6/2017	JS	2	Exhibit list assembly
10/6/2017	MS	2.5	designate Groulx deposition
10/6/2017	MD	0.2	md/ms confer about response to Kellogg re Kellogg's offer via the mediator 0.2
10/6/2017	ME	0.1	ME/JF Check-in re the process to send out witness packets
10/6/2017	ME	1.8	compile documents to send to witnesses for trial preparation
10/6/2017	MS	0.2	md/ms confer about response to Kellogg re Kellogg's offer via the mediator 0.2
10/6/2017	ME	0.2	search for document requested by attorney to use as potential trial exhibit
10/6/2017	CM	0.2	CM/JF Check-in regarding workload/paralegal responsibilities on the case (Kellogg)
10/6/2017	MS	0.2	md/ms debate strategy to deal with displays as part of Kellogg's outside sales exemption defense 0.2
10/6/2017	JK	0.5	JK/MD Review first draft of damage calculations
10/6/2017	JF	0.2	CM/JF Check-in regarding workload/paralegal responsibilities on the case (Kellogg)
10/6/2017	JK	1.5	JK Create a damage model which can be used to ascertain overtime damages based on the fluctuating work week
10/6/2017	CLER	0.1	create PDF format of doucment recd from client ( Acknowledgement and Agreement to be Bond)
10/6/2017	MD	0.2	md/ms debate strategy to deal with displays as part of Kellogg's outside sales exemption defense 0.2
10/6/2017	JK	2.4	JK Create data model of time and 1/2 damage calculations
10/6/2017	MD	0.5	JK/MD Review first draft of damage calculations
10/6/2017	MD	0.5	research for motion to exclude Kellogg's state of mind defenses 0.5
10/6/2017	MS	0.6	investigate % of total budget attributable to display bump
10/6/2017	JF	0.3	Review DEF motion to exclude bankruptcy opt-ins
10/6/2017	MS	1	interview with Carns re % of product going to displays he could influence

Date	Staff	Amount of Time	Description
10/6/2017	JF	0.2	Update witness master spreadsheet with witness count associated with DEF bankruptcy filing
10/6/2017	MS	2.5	designating Oldre deposition
10/6/2017	ME	2.1	compile documents to send to witnesses for trial preparation
10/6/2017	ME	0.2	ME/JF Check-in re production of witness packets
10/6/2017	MS	0.3	review clients who participated in the Groulx/WB studies to determine who may be good for testimony
10/6/2017	JF	0.1	ME/JF Check-in re the process to send out witness packets
10/6/2017	JF	0.1	MS/JF Task to outreach opt-ins shadowed during the industrial studies to set up attorney interview
10/6/2017	MD	0.2	md/ms confer about conversation to have with clients who participated in industrial studies 0.2
10/6/2017	JF	0.2	ME/JF Check-in re production of witness packets
10/6/2017	MD	0.5	JK/MD Discuss damage calculation methods of half time, time and one half, and hybrid.
10/6/2017	ME	1.4	prepare witness packets for trial preparation
10/6/2017	JK	0.5	JK/MD Discuss damage calculation methods of half time, time and one half, and hybrid.
10/6/2017	CLER	2.3	prepare mailing of document for clients review (trial material)
10/9/2017	MS	9	designating Kellogg 30b6 (Holton) transcript
10/10/2017	MD	0.2	MD/ME discuss priority of tasks to prepare for pre-trial order deadline
10/10/2017	CM	0.4	prepare witness packets
10/10/2017	JK	1.8	JK Determine if there are any extrapolations needed before the payroll production begins.
10/10/2017	JK	0.2	JK/MS discuss revisions to damages calculation to address Kellogg's insistence that we provide demands in a certain format
10/10/2017	ME	0.2	MD/ME discuss priority of tasks to prepare for pre-trial order deadline
10/10/2017	CLER	1	prepare mailing of document for clients review (trial material)
10/10/2017	ME	1.7	locate witness documents regarding hours worked to included as potential trial exhibits
10/10/2017	MS	0.2	JK/MS discuss revisions to damages calculation to address Kellogg's insistence that we provide demands in a certain format
10/10/2017	ME	0.1	JS/ME review status of trial exhibit list
10/10/2017	MS	0.3	draft email to mediator addressing Kellogg's offer methodology
10/10/2017	DG	0.5	edit motion to strike privileges or defenses
10/10/2017	JS	0.1	JS/ME review status of trial exhibit list
10/10/2017	JK	2.7	JK Determine if there is any missing payroll that occurs after the last dates in the payroll production.
10/10/2017	ME	0.1	ME/JF Check-in re production of witness packets
10/10/2017	MS	2.1	review and comment on jury instructions, including drafting sections on manual and blue collar labor
10/10/2017	CLER	0.3	create PDF format of deposition transcripts
10/10/2017	MS	3.1	designating Holton depo
10/10/2017	MD	8	trial prep 8
10/10/2017	ME	0.8	compile documents to send to witnesses for trial preparation
10/10/2017	JK	0.5	JK Isolate the job title held by Plaintiffs on their last pay date.
10/10/2017	MS	0.3	review MF intake for possible witness and email questions to group
10/10/2017	MD	0.5	JS/MD meet to discuss exhibits and exhibit list filing
10/10/2017	JK	0.5	JK Isolate all Plaintiffs last pay date.
10/10/2017	MS	0.7	ET/MS discuss revisions and strategies for jury instructions

Date	Staff	Amount of Time	Description
10/10/2017	JK	0.5	JK Isolate the job title held by Plaintiffs on their first pay date appearing in the produced payroll
10/10/2017	JF	0.1	ME/JF Check-in re production of witness packets
10/10/2017	JF	1.7	Conduct witness interview
10/10/2017	ME	1.3	compile documents to send to witnesses for trial preparation
10/10/2017	CM	2.5	prepare witness packets
10/10/2017	JF	0.2	CM/JF Check-in re production of witness packets
10/10/2017	JK	0.3	MD/JK Review Discount on offer tool
10/10/2017	MD	0.3	MD/JK Review Discount on offer tool
10/10/2017	JK	0.5	JK Isolate all Plaintiffs pay date.
10/10/2017	JF	0.7	Respond to witness inquires re the trial
10/10/2017	CM	0.2	CM/JF Check-in re production of witness packets
10/10/2017	JS	0.5	JS/MD meet to discuss exhibits and exhibit list filing
10/10/2017	ME	1.6	locate witness documents regarding hours worked to included as potential trial exhibits
10/10/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/10/2017	JS	5.1	Assemble exhibits; review depositions to isolate depo exhibits and add to trial exhibits
10/10/2017	JK	1.6	JK I identify Plaintiffs which have no payroll.
10/10/2017	JS	0.2	Call to Paralegal @ co-counsel's office re: IT courtroom questions.
10/10/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/11/2017	MD	0.2	MD/ME review status of search for documents to use as potential trial exhibits
10/11/2017	MS	0.8	interview with plaintiff re participation in WB study
10/11/2017	JF	3.2	Potential trial witness interviews
10/11/2017	ME	0.2	MD/ME review status of search for documents to use as potential trial exhibits
10/11/2017	JS	0.3	JS/ME determine process/best practice for adding documents to trial exhibit list
10/11/2017	MS	0.3	incorporate Kellogg changes into stipulate motion to renege and cause to be filed
10/11/2017	JK	1.8	JK Add functionality to damage calculations to calculate hourly rate based on if plaintiffs were paid time and one half for the gross pay they received.,
10/11/2017	CM	0.1	JF/CM check in re status of preparation of witness packets
10/11/2017	JF	1.4	Potential trial witness outreach
10/11/2017	ME	1.6	locate documents from defendants' production to use as potential trial witness exhibits
10/11/2017	MD	0.3	JS/MD meet to discuss exhibit list--materials needed, omissions
10/11/2017	MS	1	designate Holton deposition
10/11/2017	JS	0.3	JS/MD meet to discuss exhibit list--materials needed, omissions
10/11/2017	CM	0.4	prepare witness packet
10/11/2017	MS	4.3	draft closing argument
10/11/2017	MS	0.2	review Kellogg opposition to motion to exclude expert witnesses
10/11/2017	JS	8.2	Assemble and review exhibits
10/11/2017	MS	0.5	tc w/ J Boudreau re settlement
10/11/2017	ME	0.6	compile documents for trial exhibit list
10/11/2017	AN	0.1	Telephone call from wife of plaintiff with questions about case
10/11/2017	MS	0.1	email to ET re Kellogg opposition to motion to exclude expert witnesses
10/11/2017	JF	0.1	JF/CM check in re status of preparation of witness packets
10/11/2017	MS	1	draft stipulated motion to renege motion to exclude expert witnesses

Date	Staff	Amount of Time	Description
10/11/2017	ME	0.3	JS/ME determine process/best practice for adding documents to trial exhibit list
10/11/2017	JK	1.8	JK Add extrapolations into the trial damage calculation.
10/11/2017	AG	0.1	Emailed Word format is the Stipulated Motion to Renote Plaintiffs Motion
10/11/2017	MD	8	trial prep 8
10/11/2017	AG	0.1	ECF Filing of Stipulated MOTION to Renote Plaintiffs Motion, Doc 44
10/11/2017	CM	0.1	call from client re status of case
10/11/2017	ME	0.9	locate documents regarding hours worked for potential trial witness exhibits
10/11/2017	MS	0.2	review safety training videos for inclusion on witness list
10/11/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/11/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#448
10/11/2017	CLER	0.1	- Stipulated MOTION to Renote Plaintiffs Motion, Doc 44)
10/11/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/11/2017	ME	2.5	locate documents from defendants' production to use as potential trial witness exhibits
10/11/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/11/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#447
			- RESPONSE, by Defendants Kellogg Company, Kellogg Sales Company, to [442] MOTION
10/11/2017	CLER	0.1	to Exclude Testimony Of Defendants Experts)
10/11/2017	MS	0.1	email summary of settlement conversation to MD
10/11/2017	MR	0.3	JK/MR Check individual Plaintiffs for issues with extrapolations.
10/11/2017	JK	0.3	JK/MR Check individual Plaintiffs for issues with extrapolations.
10/12/2017	JK	1.4	JK Calculate the average rate of pay by state and year for non-damages job positions.
10/12/2017	ME	0.1	telephone call with opt-in regarding info about safety video for trial preparations
			JK Verify that filenames of payroll documents used for trial match the names of the files
10/12/2017	JK	0.6	used to calculate trial damages.
10/12/2017	JK	1.9	JK Debug damage calculations for trial.
10/12/2017	JF	1.9	Assist with various aspects of pre-trial motion filing
10/12/2017	ME	0.1	telephone call with opt-in regarding info about safety video for trial preparations
10/12/2017	MS	0.4	review and revise draft pretrial order
10/12/2017	MS	0.2	review and revise stipulations to dismiss certain plaintiffs
10/12/2017	JS	11.7	Exhibit list--assemble and review
10/12/2017	ME	0.1	left voicemail for opt-in regarding info about safety video for trial preparations
10/12/2017	JF	1.4	Edit/review interview notes
10/12/2017	ME	0.1	telephone call with opt-in regarding info about safety video for trial preparations
10/12/2017	JF	4.2	Conduct potential trial witness interviews with MF opt-ins
10/12/2017	ME	0.1	telephone call with opt-in regarding info about safety video for trial preparations
10/12/2017	MS	0.2	MD/MS discuss strategy for addressing score cards and evaluations at trial
10/12/2017	MD	0.2	MD/MS discuss strategy for compelling Kellogg witnesses to trial

Date	Staff	Amount of Time	Description
10/12/2017	ME	0.1	telephone call with opt-in regarding info about safety video for trial preparations
10/12/2017	MD	0.2	MD/MS discuss strategy for addressing score cards and evaluations at trial
10/12/2017	MS	0.5	call with mediator re call with Boudreau and Kellogg's position
10/12/2017	ME	6.6	review opt-in deposition testimony to determine which exhibits from depositions to include as trial exhibits
10/12/2017	MD	8	trial prep 8
10/12/2017	ME	1.1	compile documents to be added to trial exhibit list
10/12/2017	MS	1.3	ET/MS discuss strategy for compelling witnesses (.7); for protecting appeal rights of dismissed plaintiffs (.3); reply ISO motion to exclude witnesses (.3)
10/12/2017	MR	0.3	Locate original 10-9-2015 payroll production for 1006 filing
10/12/2017	ME	0.5	locate documents from defendants' production to use as potential trial witness exhibits
10/12/2017	MS	0.6	md/ms confer re about trial, including documents to include in exhibit list and trial arguments re willfulness and MS conversation with Boudreau re settlement 0.6
10/12/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#449 ORDER granting [448] Stipulated Motion re [442] MOTION to Exclude Testimony Of Defendants Experts)
10/12/2017	JK	2.5	JK Create dynamic table which can display the average weekly rate for plaintiffs over 40-80 hours in 5 hour increments.
10/12/2017	MS	1	review and designate IT deposition transcripts
10/12/2017	JK	0.5	JK/MD Meeting to discuss preparation of damages for trial.
10/12/2017	ME	0.3	compile documents to be added to trial exhibit list
10/12/2017	MD	0.5	JK/MD Meeting to discuss preparation of damages for trial.
10/12/2017	MS	2.1	designating Salmon Deposition for pre trial order
10/12/2017	MS	1.7	review and revise witness list topics for specific witnesses
10/12/2017	MD	0.6	md/ms confer re about trial, including documents to include in exhibit list and trial arguments re willfulness and MS conversation with Boudreau re settlement 0.6
10/12/2017	MS	0.2	revise closing argument outline section on same job duties
10/12/2017	MS	0.2	MD/MS discuss strategy for compelling Kellogg witnesses to trial
10/12/2017	ME	0.1	left voicemail for opt-in regarding info about safety video for trial preparations
10/12/2017	MS	0.7	designate Salmon deposition for trial
10/13/2017	ME	0.2	update trial witness packet status spreadsheet
10/13/2017	JK	1.3	JK Calculate the wage rate for Plaintiffs when they worked as TSRs.
10/13/2017	JF	0.1	JF/ME discuss gathering specific document for trial exhibit list
10/13/2017	ME	0.1	JF/ME discuss gathering specific document for trial exhibit list
10/13/2017	MS	1.6	review and revise undisputed facts for pre-trial order
10/13/2017	MD	8	trial prep
10/13/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#451 D. Decl ISO Doc 450)
10/13/2017	JF	3.2	Assist with various aspects of filing the pre-trial order
10/13/2017	MA	0.1	MA/JF Meet re question concerning formatting of pre-trial order
10/13/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (NOTICE TO FILER-LACK OF PROPER SIGNATURE- The Declaration of Christina L Signs [451])
10/13/2017	JF	0.2	CM/JF Question re formatting of pretrial order
10/13/2017	JS	7.2	Assemble Exhibits list
10/13/2017	JF	0.1	MA/JF Meet re question concerning formatting of pre-trial order

Date	Staff	Amount of Time	Description
10/13/2017	JS	0.2	Call regarding travel and availability for trial
10/13/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#452 D. PRAECIPE to attach document re [451] Declaration)
10/13/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#450 D Motion to Strike Amended Disclosures)
10/13/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/13/2017	MS	2	designate Salmon deposition for trial
10/13/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/13/2017	CM	0.2	CM/JF Question re formatting of pretrial order
10/13/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/13/2017	JF	0.7	Format pretrial brief
10/13/2017	MD	0.3	JK/MD Discuss format of damages to produce for trial.
10/13/2017	MS	1.7	review and revise witness list and subjects for pre-trial order
10/13/2017	JK	1.2	JK Inspect regular rate calculation exhibit for correctness before production.
10/13/2017	JK	0.3	JK/MD Discuss format of damages to produce for trial.
10/13/2017	JK	2.8	JK Create infographic comparing Plaintiffs TSR rate to RSR rate.
10/13/2017	JK	1.6	JK Create list of all weekly payroll to be produced for trial.
10/13/2017	JF	0.3	MD/ME/JS/JF Meet to discuss various tasks to be completed in order to send pre-trial submissions to DEF counsel
10/13/2017	JK	0.5	JK Proof read statement of fact section on damages
10/13/2017	ME	0.3	compile documents to be added to trial exhibit list
10/13/2017	ME	0.4	locate documents from defendants' production to use as potential trial witness exhibits
10/13/2017	JK	0.5	JK/MD Review corrections to statement of fact section on damages
10/13/2017	JK	1.8	JK Make final changes to damage calculations before production.
10/13/2017	MD	0.5	JK/MD Review corrections to statement of fact section on damages
10/13/2017	MS	0.2	review ET draft reply ISO motion to strike experts
10/13/2017	JS	0.3	MD/ME/JS/JF Meet to discuss various tasks to be completed in order to send pre-trial submissions to DEF counsel
10/13/2017	MS	0.1	email to ET re Kellogg motion to strike amended disclosures
10/13/2017	MD	0.4	MD/JF Check-in re various aspects of pre-trial order formatting
10/13/2017	ME	1.9	review opt-in deposition testimony to determine which exhibits from depositions to include as trial exhibits
10/13/2017	MS	0.2	review Kellogg motion to strike amended disclosures
10/13/2017	JF	0.4	MD/JF Check-in re various aspects of pre-trial order formatting
10/13/2017	MD	0.3	MD/ME/JS/JF Meet to discuss various tasks to be completed in order to send pre-trial submissions to DEF counsel
10/13/2017	JK	1.6	JK Remove all weeks from payroll not in the damages.
10/13/2017	ME	0.3	MD/ME/JS/JF Meet to discuss various tasks to be completed in order to send pre-trial submissions to DEF counsel
10/15/2017	MS	1	review and comment on ET draft reply re excluding expert testimony
10/15/2017	MS	0.1	respond to ET questions re reply ISO method of damage calcs
10/16/2017	AG	0.2	ECF Filing of P. REPLY TO RESPONSE to [442] MOTION to Exclude Testimony Of Defendants Experts
10/16/2017	MD	0.5	type up notes from client interviews
10/16/2017	CM	0.3	prepare witness packets
10/16/2017	JF	0.1	MD/JF Review a potential MF scorecard



Date	Staff	Amount of Time	Description
10/16/2017	JF	0.2	Call with opt-in re job duties and responsibilities as KSR-Walmart rep
10/16/2017	JS	4.8	Additional exhibits for list
10/16/2017	MD	0.2	MD/JF Check-in re trial witness interview scheduling
10/16/2017	JF	0.6	Outreach additional witness to confirm their participation in the trial proceedings
10/16/2017	MS	1.8	drafting closing statement
10/16/2017	JK	1.2	jk Write narrative describing how weekly payroll was determined from the produced payroll.
10/16/2017	JK	0.3	JK/MS discuss information and process for FRE 1006 exhibits for opposition to Kellogg's motion to strike
10/16/2017	JF	0.2	MD/JF Check-in re trial witness interview scheduling
10/16/2017	JS	0.5	Format and proof Plaintiffs Reply Brief in Support of Motion to Exclude Testimony
10/16/2017	MS	0.2	draft description of FRE process for opposition to motion to strike amended disclosures
10/16/2017	CM	0.2	CM/JF Check-in re task to mail out brochure packets to witnesses
10/16/2017	MS	0.2	email to J Boudreau re Kellogg witnesses for Tacoma testimony
10/16/2017	JS	0.2	Draft and send email with attachments regarding Kellogg Trial Prep
10/16/2017	MR	0.2	MR/JF MR to assist JF in the process of uploading vital information into master witness spreadsheet
10/16/2017	MS	0.2	JK/MS Review data production progression of damage trial calculations.
10/16/2017	MS	0.4	MD/MS discuss strategy for obtaining live Kellogg witness testimony in Tacoma
10/16/2017	MS	0.2	organize proof reading and filing of reply
10/16/2017	JF	0.2	CM/JF Check-in re task to mail out brochure packets to witnesses
10/16/2017	MD	0.1	email defense counsel about stipulation re dismissal of clients 0.1
10/16/2017	MD	0.2	MD/JF Brief meeting re witness interview scheduling
10/16/2017	JK	0.2	JK/MS Review data production progression of damage trial calculations.
10/16/2017	JF	0.2	MR/JF MR to assist JF in the process of uploading vital information into master witness spreadsheet
10/16/2017	MD	0.1	MD/JF Review a potential MF scorecard
10/16/2017	MD	0.1	edit email about witnesses to defense counsel 0.1
10/16/2017	JS	0.2	Add add'l exhibits to list for resubmission
10/16/2017	JF	0.1	JK/JF discuss the task to update the witness list
10/16/2017	JF	0.3	Perform DT search for relevant terms re Morning Foods scorecard
10/16/2017	MS	0.4	conference w/ ET re Reply re experts
10/16/2017	MD	0.1	send amended pretrial statement to defense counsel 0.1
10/16/2017	MD	1.0	amend exhibit list and pre-trial statement 1.0
10/16/2017	JF	0.2	MD/JF Brief meeting re witness interview scheduling
10/16/2017	JK	0.1	JK/JF discuss the task to update the witness list
10/16/2017	MS	1	redraft sections on Reply to motion to exclude experts
10/16/2017	JF	1.5	Organize electronic files to be up to date with trial witness selection
10/16/2017	MD	0.1	email local counsel about jury consultants 0.1
10/16/2017	JS	0.2	Draft and send email with attachments regarding Kellogg Trial Prep
10/16/2017	JF	0.1	MR/JF Review the task of searching for PDF versions of opt-in and management emails in the server database
10/16/2017	MD	0.4	MD/MS discuss strategy for obtaining live Kellogg witness testimony in Tacoma
10/16/2017	JS	0.2	Draft and send email with attachments regarding Kellogg Trial Prep
10/16/2017	JS	0.1	JS/MD discuss pre-trial statement--reviewing for omissions
10/16/2017	MD	0.1	JS/MD discuss pre-trial statement--reviewing for omissions

Date	Staff	Amount of Time	Description
10/16/2017	MS	0.6	conference w/ ET re opposition to Kellogg's motion to strike amended disclosures
10/16/2017	JF	0.2	Call with witness to change their attorney interview
10/16/2017	JF	0.2	Catch-up on case correspondence with team & trial witnesses
10/16/2017	MR	0.1	MR/JF Review the task of searching for PDF versions of opt-in and management emails in the server database
10/16/2017	JF	1.1	Revise/update witness interview reports
10/16/2017	MS	0.3	JK/MS discuss information and process for FRE 1006 exhibits for opposition to Kellogg's motion to strike
10/16/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/16/2017	JS	0.2	Draft and send email with attachments regarding Kellogg Trial Prep
10/17/2017	MD	0.1	read email from mediator re Kellogg's failure to provide offer 0.1
10/17/2017	JF	1.2	Perform outreach to witnesses to schedule their attorney led pre-trial interviews
10/17/2017	MS	0.5	legal research on Kellogg's alternative method of calculating damages
10/17/2017	CM	0.1	CM/JF Check-in re witness packet production/availability
10/17/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/17/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/17/2017	MS	0.8	MD/MS discuss issues and positions for status conference
10/17/2017	MD	0.8	MD/MS discuss issues and positions for status conference
10/17/2017	MD	0.1	MD/JF Check-in re case management (witness outreach duties)
10/17/2017	MD	0.2	edit master witness list 0.2
10/17/2017	JF	0.1	CM/JF Check-in re witness packet production/availability
10/17/2017	JF	0.1	MD/JF Check-in re ranking of additional witnesses on the Master witness tracking spreadsheet
10/17/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#454 D. RESPONSE [445] MOTION for Court to Calculate Damages Based on Jury Verdict)
10/17/2017	JF	0.2	Extract/send via email a specific supplemental page from the industrial studies to Morning Foods witnesses (industrial studies production)
10/17/2017	CM	0.2	CM/JF Discuss the task to produce list of email addresses for witnesses whose packets were processed and sent out to add supplemental industrial studies page
10/17/2017	JF	0.2	CM/JF Discuss the task to produce list of email addresses for witnesses whose packets were processed and sent out to add supplemental industrial studies page
10/17/2017	JS	0.2	Draft and send email re: quotes on mock jury / focus groups
10/17/2017	MD	0.1	MD/JF Review the task to add additional page to the witness packet
10/17/2017	JF	1.5	Create/update interview tracking sheet (tracking of attorney-led witness interviews)
10/17/2017	JS	0.2	Send copy of Travel Request form to plt.
10/17/2017	MD	0.1	JS/MD discuss mock trial planning and additional bids
10/17/2017	JF	0.1	MD/JF Check-in re case management (witness outreach duties)
10/17/2017	JS	0.6	Research possible mock trial provider, .4; Draft and send email to same for quote or estimate, .2
10/17/2017	MS	4.5	drafting reply ISO motion for court to calculate damages

Date	Staff	Amount of Time	Description
10/17/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/17/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/17/2017	JS	1.6	Review Exhibit List, add categories for ease of locating documents
10/17/2017	MA	0.1	MA/JF review the process to burn CD on my computer
10/17/2017	MD	0.2	read Kellogg's opposition for the Court to calculate damages 0.2
10/17/2017	JF	0.1	MA/JF review the process to burn CD on my computer
10/17/2017	CM	1.1	prepare witness packets .7, cross check witness packets sent .4
10/17/2017	CLER	0.1	Data Entry of contact information .10
10/17/2017	MD	0.1	read court order re denying Kellogg's decertification motion 0.1
10/17/2017	MD	3	edit motion to strike Kellogg's defenses 3.0
10/17/2017	MD	0.1	email defense counsel about the number of lines they'll need for court conference 0.1
10/17/2017	CLER	0.1	create PDF format of CTS recd
10/17/2017	CM	0.3	prepare email list of witnesses who need to receive additional page for packet
10/17/2017	MD	0.5	edit outline for conversation with clients to prep for testimony 0.5
10/17/2017	JF	0.2	Field a call from witness re travel reimbursement questions
10/17/2017	MD	0.3	MD/MS meet to discuss outstanding tasks, status and responsibilities
10/17/2017	JF	0.1	MD/JF Review the task to add additional page to the witness packet
10/17/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/17/2017	JS	0.1	JS/MD discuss mock trial planning and additional bids
10/17/2017	MS	0.3	MD/MS meet to discuss outstanding tasks, status and responsibilities
10/17/2017	CM	1.2	prepare witness packets
10/17/2017	JF	0.1	Compose/send email to witness re questions of travel reimbursement
10/17/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/17/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/17/2017	CLER	0.3	prepare mailing of document for clients review (trial material)
10/17/2017	CLER	0.3	prepare mailing of document for clients review (trial material)
10/17/2017	JF	0.2	Compose/send email with specific questions to team re travel reimbursement
10/18/2017	MD	3.5	interview client for trial 3.5
10/18/2017	MD	0	prepare for client interview 0.5
10/18/2017	MD	0.1	email JS re edit brief to strike Kellogg's defenses 0.1
10/18/2017	MD	0	prepare for client interview 0.5
10/18/2017	MD	0.1	email team about trial prep video 0.1
10/18/2017	MD	0.4	MD/JF Strategize as to the manner of handling witness communication in light of change of trial scheduling
10/18/2017	JS	3.4	Format, proof, and generate table of contents and table of authorities for Motion to Compel Production or Strike Defenses
10/18/2017	CM	1.9	prepare witness packets
10/18/2017	JF	0.4	MD/JF Strategize as to the manner of handling witness communication in light of change of trial scheduling
10/18/2017	ME	0.2	compile documents to send to witnesses for trial preparation
10/18/2017	MD	3.5	interview client for trial 3.5
10/18/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#456 MINUTE ENTRY proceedings before Judge Leighton 10.18.2017)
10/18/2017	ME	0.2	read court order denying defendants' motion to decertify and dismiss

Date	Staff	Amount of Time	Description
10/18/2017	MD	2	editing motion to strike Kellogg's defenses 2.0
10/18/2017	JS	0.4	Add revised trial dates to office calendar
10/18/2017	JS	0.4	Review Order on class decert motion.
10/18/2017	ME	0.2	telephone call to intake regarding late consent to sue
10/18/2017	ME	0.9	compile documents to send to witnesses for trial preparation
10/18/2017	JF	0.4	Field calls from witnesses re scheduling/changes in trial schedule
10/18/2017	AG	0.3	Emailed Tuddenham documents (dockets 427,442,453,441,446, trial docs)
10/18/2017	MD	0.5	review interview notes from additional potential witnesses 0.5
10/18/2017	MD	0.2	review Kellogg's proposed stipulation re dismissal of plaintiffs 0.2
10/18/2017	JF	2.1	Prepare motus data for witness packets to be mailed out this week
10/18/2017	MD	0.1	review court order re trial dates 0.1
10/18/2017	MS	0.3	participate on telephone conference with Judge and defense counsel 0.3
10/18/2017	ME	3.1	compile documents to send to witnesses for trial preparation
10/18/2017	MS	0.3	participate on telephone conference with Judge and defense counsel 0.3
10/18/2017	AG	0.1	2455 Order Denying Motion to Decert-Dismiss
10/18/2017	MD	0.3	participate on telephone conference with Judge and defense counsel 0.3
10/18/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#457 MINUTE ORDER RE: TRIAL SCHEDULE)
10/18/2017	MD	0.2	md/ms strategize in advance of confernece call with Court 0.2
10/18/2017	MS	0.2	md/ms strategize in advance of confernece call with Court 0.2
MD/JF Check-in re 1. drafting of various communications to witnesses re change of trial schedule; 2. change of case management meeting time to an earlier timeframe; 3. the			
10/19/2017	JF	0.3	process to notify the named plaintiff about the changes in the trial schedule
10/19/2017	JS	0.8	Assemble exhibits for Motion to Strike/Compel Discovery
10/19/2017	JS	0.4	Proof and finalize Motion to Strike/Compel Discovery
10/19/2017	JF	1.6	Draft/send to team various communications to witnesses re trial date changes
10/19/2017	ME	0.5	ME/JF Discuss various aspects of handling witness communication given the change of trial dates
10/19/2017	JF	3.1	Prepare/send individual email notifications to all witnesses re trial dates changes
10/19/2017	ME	0.8	MD/ME/JS/JF Weekly Kellogg Meeting (discussion of trial timeframe, paralegal responsibilities)
10/19/2017	ME	0.5	compile documents to send to witnesses for trial preparation
10/19/2017	MD	0.8	MD/ME/JS/JF Weekly Kellogg Meeting (discussion of trial timeframe, paralegal responsibilities)
10/19/2017	JS	0.8	MD/ME/JS/JF Weekly Kellogg Meeting (discussion of trial timeframe, paralegal responsibilities)
10/19/2017	ME	0.1	print agendas for team meeting
10/19/2017	ME	0.6	compile documents to send to witnesses for trial preparation
10/19/2017	MD	3.5	edit and finalize brief to strike Kellogg's defenses 3.5
10/19/2017	JF	0.5	ME/JF Discuss various aspects of handling witness communication given the change of trial dates
10/19/2017	JS	0.8	Plan out trial schedule for travel purposes
MD/JF Check-in re 1. drafting of various communications to witnesses re change of trial schedule; 2. change of case management meeting time to an earlier timeframe; 3. the			
10/19/2017	MD	0.3	process to notify the named plaintiff about the changes in the trial schedule
10/19/2017	AG	0.2	ECF Filing of MOTION to Strike Defenses or Compel Production
10/19/2017	JS	1.1	Proof brief and add citations to ToA

Date	Staff	Amount of Time	Description
10/19/2017	JS	0.6	Call with Pipeline Recruiting re: Mock Trial / Focus Group
			Draft email to Harbor Home Rentals re: shifting lease due to revised trial schedule per
10/19/2017	JS	0.5	Court's direction
10/19/2017	JF	0.5	Outreach witnesses who were scheduled for pre-trial interview with MD
			Transfer documents recd from ECF system to docket file and create file copy (Docket#458
10/19/2017	CLER	0.1	D. MOT to Strike P. 10.6.2017 Amended Initial Disclosures)
			MD/ME/JS/JF Weekly Kellogg Meeting (discussion of trial timeframe, paralegal
10/19/2017	JF	0.8	responsibilities)
10/19/2017	ME	3.1	compile documents to send to witnesses for trial preparation
10/19/2017	JS	0.2	Respond to email request for travel approval from Travel Leaders
10/19/2017	ME	0.6	add case update about trial schedule change to website
10/20/2017	MD	0.2	MD/JF Check-in re selection of top trial witnesses
			Transfer documents recd from ECF system to docket file and create file copy (Docket#460
			NOTICE that the following is RE-NOTED: [459] MOTION to Strike Defenses or Compel
10/20/2017	CLER	0.1	Production)
10/20/2017	JF	0.2	ME/JF Check-in re timeframe for review of the top trial witnesses
10/20/2017	MD	0.7	research history of payroll data and edit motion to strike JK 0.7
10/20/2017	JF	0.3	Check send this file document transfers/the documents' reception by the Defendants
10/20/2017	MD	0.2	read defense counsel letter about exhibits .2
10/20/2017	ME	0.2	ME/JF Check-in re timeframe for review of the top trial witnesses
10/20/2017	CLER	1	prepare mailing of document for clients review (trial material)
10/20/2017	JF	0.1	MS/JF Check-in re trial date change impact re witness scheduling
10/20/2017	AG	0.1	459 P. MOTION to Strike Defenses or Compel Production
10/20/2017	MS	0.6	revise and circulate Reply ISO motion for Court to calculate damages
			collect dates and emails for reply brief re FRE 1006 exhibit and replying to Kellogg's
10/20/2017	MD	0.3	opposition brief 0.3
			md/ms confer about data for response to Kellogg's opposition re Court calculates
10/20/2017	MD	0.1	damages 0.1
			md/ms confer about data for response to Kellogg's opposition re Court calculates
10/20/2017	MS	0.1	damages 0.1
			send CM status of compiled trial witness packets so that she can continue to assemble
10/20/2017	ME	0.2	them for mailing
10/20/2017	CM	3.1	prepare witness packets
10/20/2017	JF	0.2	MD/JF Check-in re selection of top trial witnesses
			MD/JF Task to review 1. whether pre-trial order and adjacent forms were downloaded by
10/20/2017	JF	0.2	Defendants; 2. check on the correctness/accuracy of documents that were sent
			Transfer documents recd from ECF system to docket file and create file copy (Docket#461
			- P. REPLY TO RESPONSE to [445] MOTION for Court to Calculate Damages Based on Jury
10/20/2017	CLER	0.1	Verdict)
10/20/2017	CM	0.1	CM/JF Check-in re production of witness packets (cover letter question)
10/20/2017	JS	0.5	Review, edit, and format P Reply Case Mgt Motion re Damages
10/20/2017	JF	0.5	ME/JF Discuss the system of vetting the top trial witnesses
10/20/2017	CM	3.3	prepare witness packets
10/20/2017	JF	0.3	ME/JF Check-in re 1. production of packets; 2. review of witnesses process
			ECF Filing of P. REPLY TO RESPONSE to [445] MOTION for Court to Calculate Damages
10/20/2017	AG	0.1	Based on Jury Verdict)
10/20/2017	ME	3.9	compile documents to send to witnesses for trial preparation
10/20/2017	JF	0.1	CM/JF Check-in re production of witness packets (cover letter question)

Date	Staff	Amount of Time	Description
10/20/2017	JF	0.2	JF/ME review updates to trial witness interview status spreadsheet
10/20/2017	JS	3.7	Exhibit List tagging with searchable terms
10/20/2017	MD	0.2	MD/JF Check-in re outreach of witnesses re change of trial schedule (order of priorities)
10/20/2017	ME	0.2	create spreadsheet to track detailed notes about top trial witnesses
10/20/2017	ME	0.1	delete old trial dates from calendar
10/20/2017	ME	0.2	JF/ME review updates to trial witness interview status spreadsheet
10/20/2017	JS	0.4	Order Trial Prep DVD
10/20/2017	JF	0.6	Compile Motus data for the remainder of the witnesses who still needed their witness packets mailed to them
10/20/2017	MD	1	identify plaintiffs who will testify first 1.0
10/20/2017	JF	0.1	MA/JF Review the steps to check whether or not sendthisfile production (pre-trial order) was downloaded by the Defendants
10/20/2017	MD	0.1	email defense counsel about FRE 1006 exhibits 0.1
10/20/2017	MS	0.1	MS/JF Check-in re trial date change impact re witness scheduling
10/20/2017	JF	1.1	Email responses to witnesses re trial date change/trial availability
10/20/2017	MA	0.1	MA/JF Review the steps to check whether or not sendthisfile production (pre-trial order) was downloaded by the Defendants
10/20/2017	JF	0.2	MD/JF Check-in re outreach of witnesses re change of trial schedule (order of priorities)
10/20/2017	MD	5	trial prep 5.0
10/20/2017	ME	0.3	ME/JF Check-in re 1. production of packets; 2. review of witnesses process
10/20/2017	ME	0.5	ME/JF Discuss the system of vetting the top trial witnesses
10/20/2017	MD	0.2	MD/JF Task to review 1. whether pre-trial order and adjacent forms were downloaded by Defendants; 2. check on the correctness/accuracy of documents that were sent
10/20/2017	CLER	1.1	prepare mailing of document for clients review (trial material)
10/21/2017	MS	1.1	revisions to opposition to Kellogg's motion to strike Kandel testimony
10/21/2017	MS	0.1	email to JK to confirm certain information for Reply ISO motion for Court to calculate damages
10/23/2017	ME	0.2	ME/JF Check-in re status of the task to vet the 12 top witnesses
10/23/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#462 - P. RESPONSE [450] MOTION Motion to Strike Plaintiffs' Amended Initial Disclosures Identifying Fact Witness Jason Kandel)
10/23/2017	JF	2.1	Format/prepare brief for filing
10/23/2017	AG	0.1	ECF Filing of P. RESPONSE [450] MOTION Motion to Strike Plaintiffs' Amended Initial Disclosures Identifying Fact Witness Jason Kandel
10/23/2017	MS	0.2	draft response to Kellogg settlement offer
10/23/2017	MS	0.4	analyzing settlement terms of Kellogg settlement offer
10/23/2017	ME	1.5	compile information about top trial witnesses for attorney review
10/23/2017	JF	0.1	CM/JF Check-in re status of the packets to be mailed out to trial witnesses
10/23/2017	CM	0.1	CM/JF Check-in re status of the packets to be mailed out to trial witnesses
10/23/2017	JF	0.2	ME/JF Check-in re status of the task to vet the 12 top witnesses
10/23/2017	CLER	0.1	create PDF format of document recd from client (Acknowledgment/Agreement)
10/23/2017	MS	1.7	finalize opposition to Kellogg Motion to strike Kandel
10/23/2017	ME	0.3	compile documents for trial witness packets
10/23/2017	CM	0.6	prepare witness packets
10/23/2017	MS	0.3	MD/MS discuss strategy for responding to Kellogg settlement offer



Date	Staff	Amount of Time	Description
10/23/2017	JF	0.1	MS/JF Check-in re task to format the response to DEF motion to strike JK's testimony
10/23/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/23/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/23/2017	CLER	0.6	prepare mailing of document for clients review (trial material)
10/23/2017	MS	0.3	md/ms confer about responding to Kellogg's latest offer 0.3
10/23/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/23/2017	ME	1.5	compile information about top trial witnesses for attorney review
10/23/2017	ME	0.2	locate exhibits needed to send to defendants per their request
10/23/2017	JF	0.6	Archive/review DEF production received on 10/21/17
10/23/2017	MA	1	proofread opposition to motion to exclude JK
10/23/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/23/2017	MD	8	trial prep
10/23/2017	MD	0.1	MD/JF Check-in re 1. the tasks for the day; 2. the review of DEF production received on 10/21/17
10/23/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/23/2017	MD	0.3	md/ms confer about responding to Kellogg's latest offer 0.3
10/23/2017	JF	0.1	MD/JF Check-in re 1. the tasks for the day; 2. the review of DEF production received on 10/21/17
10/23/2017	MS	0.1	MS/JF Check-in re task to format the response to DEF motion to strike JK's testimony
10/24/2017	MD	8	trial prep 8
10/24/2017	JS	0.5	Compress additional exhibit files for defendant identification, send via FTP to opposing counsel
10/24/2017	AG	0.1	ECF Filing of NOTICE that the following is RE-NOTED [459] MOTION to Strike Defenses or Compel Production .
10/24/2017	JS	0.3	Reply to HarborHome Rentals re: Yakima house
10/24/2017	MD	0.3	MD/MS discuss strategy for responding to Kellogg settlement offer
10/24/2017	ME	1.8	compile information about top trial witnesses for attorney review
10/24/2017	MD	0.5	md/ms call with mediator about Kellogg's offer and plaintiffs' response 0.5
10/24/2017	MD	0.2	JS/MD discuss trial exhibits; status and next steps
10/24/2017	JF	2.3	Review briefs/motions in order to adequately prepare for trial proceedings
10/24/2017	JS	0.2	JS/MD discuss trial exhibits; status and next steps
10/24/2017	JF	1.2	Outreach top 12 witnesses
10/24/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#463 - NOTICE that the following is RE-NOTED [459] MOTION to Strike Defenses or Compel Production)
10/24/2017	CM	0.7	update case fees
10/24/2017	MS	0.5	md/ms call with mediator about Kellogg's offer and plaintiffs' response 0.5
10/24/2017	ME	0.5	ME/JF Meet to discuss various tasks and projects in preparation for trial
10/24/2017	JS	0.2	Reply to McVaugh email, save invoice
10/24/2017	JS	2.7	Break out all consents to sue from opt-ins; rename with filenames that denote contents
10/24/2017	JS	0.5	Assemble additional copies of exhibits for defendant identification
10/24/2017	JF	0.5	ME/JF Meet to discuss various tasks and projects in preparation for trial

Date	Staff	Amount of Time	Description
10/25/2017	JS	0.2	Call re trial dates and scheduling
10/25/2017	JS	0.3	Review amended lease, pass to attorney for execution
10/25/2017	ME	0.1	left voicemail for potential trial witness
10/25/2017	JS	0.4	Email correspondence with Shea from Pipeline re: invoice and scheduling
10/25/2017	ME	0.1	MD/ME discuss reaching out to potential plaintiff trial witness
10/25/2017	JS	4.2	Review and rename split CTS form files (c. 300)
10/25/2017	JS	0.3	Call from opt-in re: trial scheduling
10/25/2017	MD	8	trial prep 8
10/25/2017	AD	0.7	review exhibit list .7
10/26/2017	MD	6	trial prep 6.0
10/26/2017	JS	0.2	Email to travel agency re: shift in trial schedule
10/26/2017	JS	2.3	Review CTS forms and rename with opt-in
			JS/ME discuss best practice for creating individual files of consents to sue that contain
10/26/2017	JS	0.2	docket stamp
			Outreach the remainder of the top 12 witnesses for the purposes of scheduling a
10/26/2017	JF	0.7	conversation with MD
10/26/2017	JS	1.2	Rip Trial Prep DVD and save files, convert to accessible formats
			JS/ME discuss best practice for creating individual files of consents to sue that contain
10/26/2017	ME	0.2	docket stamp
			ME/JF Discuss alternate sources to look for specific TSR/PTM territory
10/26/2017	ME	0.1	assignments/designations
			ME/JF Discuss alternate sources to look for specific TSR/PTM territory
10/26/2017	JF	0.1	assignments/designations
10/26/2017	ME	0.1	send email to potential opt-in trial witness
10/26/2017	MS	0.7	MS/MD/AD/ME/JS/JF Weekly Team Meeting
10/26/2017	JS	0.2	Email correspondence with potential mock trial provider
10/26/2017	ME	0.2	draft letter to return consent to sue to intake
10/26/2017	JF	0.8	Catch up on correspondence to clients re trial schedule changes
10/26/2017	JF	0.7	MS/MD/AD/ME/JS/JF Weekly Team Meeting
10/26/2017	AD	0.7	MS/MD/AD/ME/JS/JF Weekly Team Meeting
10/26/2017	ME	0.7	MS/MD/AD/ME/JS/JF Weekly Team Meeting
10/26/2017	MD	0.7	MS/MD/AD/ME/JS/JF Weekly Team Meeting
10/26/2017	JS	0.7	MS/MD/AD/ME/JS/JF Weekly Team Meeting
10/26/2017	AG	0.1	ECF Filing of Stipulated MOTION for Extension of Time for Filing Motions in Limine
			Send revised lease to CM with request for additional payment for housing (lease pushed
10/26/2017	JS	0.3	forward and extended due to trial dates changing)
			Assist JF with DTSearch drive mapping issue .1; assist JF with locating TIF file
10/26/2017	MR	0.3	corresponding to text file .2
			Transfer documents recd from ECF system to docket file and create file copy (Docket#464
10/26/2017	CLER	0.1	- Stipulated MOTION for Extension of Time for Filing Motions in Limine)
10/27/2017	CM	0.9	compile spreadsheet of hours kept on plaintiff calendars
10/27/2017	JF	0.2	CM/JF Review the PLT-kept time documents for relevant information
10/27/2017	JS	2.3	Troubleshoot converting video (no sound--cannot isolate audio track)
10/27/2017	JS	2.7	Review and rename CTS forms, continuing project
			CM/JF Discuss the task to consolidate the PLT-kept hours worked (calendars, etc.) into
10/27/2017	JF	0.2	one spreadsheet (trial witness preparation)
			MD/JF Discuss the task to 1. compute miles/time driven for witness; 2. compile a
10/27/2017	MD	0.1	spreadsheet of witness-tracked hours worked (daily & weekly).

Date	Staff	Amount of Time	Description
10/27/2017	CM	0.2	CM/JF Review the PLT-kept time documents for relevant information
10/27/2017	JF	0.5	Review PLT-kept time documents to delegate the task to CM
10/27/2017	JF	0.1	MD/JF Check-in re scheduling of witness pretrial interviews
10/27/2017	JF	0.1	MD/JF Discuss the task to 1. compute miles/time driven for witness; 2. compile a spreadsheet of witness-tracked hours worked (daily & weekly).
10/27/2017	MD	0.1	MD/JF Check-in re scheduling of witness pretrial interviews
10/27/2017	JF	0.2	CM/JF Discuss the task to compile a spreadsheet of hours worked for each witnesses who kept such record/records
10/27/2017	CM	0.2	CM/JF Discuss the task to consolidate the PLT-kept hours worked (calendars, etc.) into one spreadsheet (trial witness preparation)
10/27/2017	JF	1.2	Compile witness miles driven/time spent driving while servicing territory (trial preparation)
10/27/2017	MD	6	trial prep 6.0
10/27/2017	JF	0.6	Catch up on email and correspondence re trial/trial rescheduling
10/27/2017	CM	0.2	CM/JF Discuss the task to compile a spreadsheet of hours worked for each witnesses who kept such record/records
10/30/2017	MR	0.5	Review trial witness prep video .4; Email comments about video to team .1
10/30/2017	MR	0.1	MR/JF Check-in re excluded job title/category (re current claims)
10/30/2017	JF	0.1	JK/JF Brief check-in re excluded job title & potential case claims
10/30/2017	MS	0.1	review and circulate Kellogg reply ISO motion to strike Kandel
10/30/2017	MD	7	trial prep 7
10/30/2017	MS	0.2	draft and circulate strategy outline for requirements contract argument
10/30/2017	MS	1.2	legal research into requirements contract jury instruction
10/30/2017	MD	0.2	JK/MD Discuss telephone records analysis for trial.
10/30/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/30/2017	JK	0.1	JK/JF Brief check-in re excluded job title & potential case claims
10/30/2017	CM	1.8	prepare hours spreadsheet based on opt-in timesheets
10/30/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/30/2017	MS	0.7	review witness trial prep video
10/30/2017	JK	0.2	JK/MD Discuss telephone records analysis for trial.
10/30/2017	JF	0.1	MR/JF Check-in re excluded job title/category (re current claims)
10/30/2017	MS	1.1	draft response to motion to strike Roark and McCartt
10/30/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#465 D. REPLY TO RESPONSE [450] Motion to Strike P. Amended Initial Disclosures)
10/30/2017	JF	0.2	MD/JF Discuss the task to closely examine DEF-compiled list of potentially excluded opt-ins
10/30/2017	MD	0.3	MD/JF Discuss the task to 1. download additional documents received from DEF counsel; 2. outreach witnesses re their bankruptcy claims; 3. identify Kellogg-designated witnesses
10/30/2017	AD	1.8	Draft memo regarding trial witness subpoenas 1.0; conduct research .8
10/30/2017	MS	0.3	JS/MS discuss various trial-related topics, including Kellogg mot. to strike expert testimony, opening and closing arguments and possibility of visual aids to crystallize concepts and ideas, witness and exhibit lists, and next steps to prepare for trial.
10/30/2017	MS	0.1	MD/MS discuss risk reevaluation based on ET input

Date	Staff	Amount of Time	Description
10/30/2017	JF	0.3	MD/JF Discuss the task to 1. download additional documents received from DEF counsel; 2. outreach witnesses re their bankruptcy claims; 3. identify Kellogg-designated witnesses
10/30/2017	MS	0.3	ET/MS discuss settlement status and strategy
10/30/2017	MS	0.1	review and comment on stip to dismiss Plaintiffs w/ FLSA claims outside the SOL
10/30/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/30/2017	MD	0.1	MD/MS discuss risk reevaluation based on ET input
10/30/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#466 STIPULATION AND ORDER re [464] Stipulated MOTION for Extension of Time)
10/30/2017	AG	0.1	ECF Filing of P. RESPONSE [458] MOTION to Strike Plaintiffs' October 6, 2017 Amended Initial Disclosures Identifying Fact Witnesses James McCartt and Robert Roark and to Preclude Their Testimony at Trial
10/30/2017	MS	0.2	MD/MS discuss strategies for dealing with happy camper declarations from opt-ins listed in Kellogg pretrial submission
10/30/2017	JS	3.4	Clean up and begin ordering Exhibit list
10/30/2017	CLER	0.1	PCF Client Data Entry of updated contact information .10
10/30/2017	JF	0.1	Send link to attorneys with DEF trial exhibit list
10/30/2017	MS	0.2	email to Kellogg team re document and witness issues arising from Kellogg pretrial submission
10/30/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#467 - P. RESPONSE [458] MOTION to Strike Plaintiffs' October 6, 2017 Amended Initial Disclosures Identifying Fact Witnesses James McCartt and Robert Roark and to Preclude Their Testimony at Trial)
10/30/2017	MS	0.3	review and take notes on Kellogg's witness list
10/30/2017	JS	2.6	Revise exhibit list and optimize for ordering exhibits sequentially
10/30/2017	JS	1.4	Troubleshoot Trial Prep video conversion
10/30/2017	JF	0.2	Call with potential trial witness re trial update/update of contact information
10/30/2017	MD	0.2	MD/JF Discuss the task to closely examine DEF-compiled list of potentially excluded opt-ins
10/30/2017	JF	0.7	Catch up on witness correspondence
10/30/2017	MS	0.4	review and take notes on Kellogg's exhibit list
10/30/2017	JF	0.1	Download/save the most recent DEF production (personnel folder components - evaluations)
10/30/2017	JS	0.3	JS/MS discuss various trial-related topics, including Kellogg mot. to strike expert testimony, opening and closing arguments and possibility of visual aids to crystallize concepts and ideas, witness and exhibit lists, and next steps to prepare for trial.
10/30/2017	JS	0.1	Email to MD re: planning and scheduling mock trial
10/30/2017	MS	0.3	finalize response re motion to strike McCartt and Roark for filing
10/30/2017	JS	0.2	Call with shea re: dates
10/30/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Reset Deadlines: Motions in Limine due by 11/6/2017)
10/30/2017	MS	0.2	MD/MS discuss strategies for dealing with issues arising from witnesses list in Kellogg pretrial submission
10/30/2017	MD	0.2	MD/MS discuss strategies for dealing with happy camper declarations from opt-ins listed in Kellogg pretrial submission

Date	Staff	Amount of Time	Description
10/30/2017	MD	0.2	MD/MS discuss strategies for dealing with issues arising from witnesses list in Kellogg pretrial submission
10/30/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
10/30/2017	JF	1.3	Perform a detailed analysis of the opt-ins that DEF counsel proposes to dismiss from the case
10/30/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Set/Reset Deadlines: Motions in Limine due by 10/30/2017)
10/31/2017	CM	0.6	CM/JF Check-in re task to mail out notices to opt-ins who are outside of SOL (therefore do not have claims in the case)
10/31/2017	ME	0.3	add email addresses to list of trial witnesses who have not submitted travel information
10/31/2017	MD	1	md/ms confer about arguments to make re "sales" 1.0
10/31/2017	JS	0.1	JS/ME discuss project for outreach to nonresponder travelers
10/31/2017	JS	3.4	Organize PLT Exhibit list by usefulness of exhibits; order sequentially
10/31/2017	ME	0.1	JS/ME discuss project for outreach to nonresponder travelers
10/31/2017	JS	0.2	Review and forward email invoice from focus group / mock trial provider to MD
10/31/2017	JF	0.2	CM/JF Check-in re time availability for mailout project (opt-ins who are outside of SOL hence not part of the case)
10/31/2017	CM	0.4	prepare spreadsheet of hours as noted in opt-in's notebook
10/31/2017	MD	4	trial prep 4
10/31/2017	MS	0.1	MS/ME locate bates document indicated on defendants' trial exhibit list
10/31/2017	JS	0.2	JS/MS discuss Defendant's Exhibit list--how best to organize for our review
10/31/2017	MD	0.3	MD/JF Check-in re outreach to 1. dismissed opt-ins; 2. deceased opt-ins; 3. opt-ins involved in bankruptcy proceedings
10/31/2017	AD	0.3	Watch trial prep video .3
10/31/2017	JF	0.6	CM/JF Check-in re task to mail out notices to opt-ins who are outside of SOL (therefore do not have claims in the case)
10/31/2017	JS	0.2	Email to Travel Leaders re: nonresponders and hotel rates
10/31/2017	MS	0.2	JS/MS discuss Defendant's Exhibit list--how best to organize for our review
10/31/2017	MS	0.2	email to J Sagafi re jury instructions in FLSA case
10/31/2017	JF	1.2	Review the records of the list of people stipulated to be dismissed from the case
10/31/2017	JF	0.1	Outreach potential witness for scheduling of a follow-up interview with MD
10/31/2017	JF	2.7	Outreach clients re potential bankruptcy dismissal
10/31/2017	JS	0.8	Further troubleshooting with Trial Prep Video; end of video cut off. Re-run converter.
10/31/2017	JF	0.2	JS/JF Check-in re progress of tasks/trial preparations
10/31/2017	JS	0.2	Call from Shea regarding timeline and invoicing
10/31/2017	MS	1	md/ms confer about arguments to make re "sales" 1.0
10/31/2017	JS	0.6	Research and book flight to Tacoma for Tech Training at court
10/31/2017	CM	0.2	CM/JF Check-in re time availability for mailout project (opt-ins who are outside of SOL hence not part of the case)
10/31/2017	JF	0.2	CM/JF Discuss the project to transcribe time records kept by witnesses to prepare for attorney-led pre-trial witness interviews
10/31/2017	JS	0.2	JS/JF Check-in re progress of tasks/trial preparations
10/31/2017	ME	0.1	MS/ME explain task of collecting opt-in declarations cited in defendants' trial exhibit list
10/31/2017	JF	0.3	MD/JF Check-in re outreach to 1. dismissed opt-ins; 2. deceased opt-ins; 3. opt-ins involved in bankruptcy proceedings

Date	Staff	Amount of Time	Description
10/31/2017	CM	0.2	CM/JF Discuss the project to transcribe time records kept by witnesses to prepare for attorney-led pre-trial witness interviews
10/31/2017	CM	1.1	prepare mail merge for letter to opt-ins who are excluded due to statute of limitations
10/31/2017	MS	0.1	MS/ME explain task of collecting opt-in declarations cited in defendants' trial exhibit list
10/31/2017	ME	0.7	compile information about declarations listed in defendants' trial exhibit list
10/31/2017	ME	0.1	MS/ME locate bates document indicated on defendants' trial exhibit list
10/31/2017	AD	2.1	Research for deceased claimants 1.8; draft email .3
11/1/2017	CM	0.8	prepare spreadsheet of hours based on opt-in timesheets
11/1/2017	CM	0.3	run mail merge of letters to opt-ins excluded by statute of limitations
11/1/2017	JF	0.2	AD/JF Discuss the process to handle 1. deceased clients & their claims; 2. client questions re bankruptcy
11/1/2017	CLER	0.5	prepare mailing to excluded opt-ins
11/1/2017	JF	1.6	Email individual letters to clients re dismissal from the case
11/1/2017	JF	0.4	CM/JF Discuss the process to prepare a mailout notice to clients to be dismissed from the case
11/1/2017	JF	0.2	MD/JF Meet to discuss 1. bankruptcy outreach; 2.deceased plaintiffs outreach; 3. outside of SOL & other reasons for dismissal
11/1/2017	CM	0.3	CM/JF Discuss the process of mailing out the letter of dismissal
11/1/2017	JF	0.9	Draft/send for attorney review individual letters of dismissal to be mailed out to individual clients
11/1/2017	JF	0.1	Respond to opt-in question re bankruptcy dismissal
11/1/2017	MS	0.4	email to ET re grounds for excluding declarations, linked in pages, and late produced documents
11/1/2017	CM	0.6	prepare mail merge for opt-in who are excluded based on job title
11/1/2017	JK	0.5	JK create video rip of trial prep DVD
11/1/2017	MS	0.5	review Kellogg exhibit list for motion in limine
11/1/2017	JS	2.7	Reconcile Defendant's Exhibit List--items not yet produced
11/1/2017	JS	3.1	Order Plt exhibit list sequentially
11/1/2017	CLER	1.1	prepare mailing to excluded opt-ins
11/1/2017	MD	8	trial prep 8
11/1/2017	MS	2.1	review and revise motion in limine
11/1/2017	MD	0.2	MD/JF Meet to discuss 1. bankruptcy outreach; 2.deceased plaintiffs outreach; 3. outside of SOL & other reasons for dismissal
11/1/2017	JF	2.9	Review/track each individual client's circumstances of their potential dismissal of claims
11/1/2017	JK	0.8	JK Use handbrake to create streaming version of witness preparation video.
11/1/2017	JS	0.4	Execute cc authorization for hotel and send to travel agent.
11/1/2017	AD	0.2	AD/JF Discuss the process to handle 1. deceased clients & their claims; 2. client questions re bankruptcy
11/1/2017	JF	0.3	CM/JF Discuss the process of mailing out the letter of dismissal
11/1/2017	CM	0.4	CM/JF Discuss the process to prepare a mailout notice to clients to be dismissed from the case
11/2/2017	MR	0.1	Send file link for plaintiff ids list to para JF
11/2/2017	MS	1	MD/MS discuss strategy for plaintiff trial testimony
11/2/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
11/2/2017	JS	3.7	Review and pull exhibits from Defendants' Exhibit list--hyperlink in index for ease of location and reference



Date	Staff	Amount of Time	Description
11/2/2017	MD	1	MD/MS discuss strategy for plaintiff trial testimony
11/2/2017	AD	1.3	Review clients damages to figure out settlement value 1.3
11/2/2017	JF	0.2	MR/JF Specify the location of damage calculation spreadsheet in the case folder
11/2/2017	MS	0.4	analyze happy camper declarations
11/2/2017	MD	8	trial prep
11/2/2017	MS	0.4	outline motion in limine re late docs
11/2/2017	ME	0.1	ME/JF Discuss the task to locate an email with MD's instructions re top 12 witnesses
11/2/2017	MS	0.2	email to ET re trial time apportionment
11/2/2017	JS	0.5	Travel arrangements for technology training: research EWR parking
11/2/2017	MS	0.1	email to Boudreau re Groulx testimony
11/2/2017	AD	2.4	Review depo testimony to counter designate and object 2.4
11/2/2017	CLER	0.3	prepare mailing to excluded opt-ins
11/2/2017	MS	0.2	tc to happy camper declarant and memo
11/2/2017	JS	1.7	Travel arrangements for technology training: create day sheet with all parties and suppliers, schedule, travel information
11/2/2017	JS	3.2	REview and re-order PLT exhibit list for submission.
11/2/2017	JS	0.5	Travel arrangements for technology training: arrange car rental
11/2/2017	MR	0.2	MR/JF Specify the location of damage calculation spreadsheet in the case folder
11/2/2017	MS	1	team meeting to cover mock trial, motions in limine, depo digesting, exhibits, witness scheduling, and outstanding motions
11/2/2017	JF	0.1	JK/JF JF to request damage calculation spreadsheet copy (for purposes of communicating with the bankruptcy attorneys)
11/2/2017	MS	0.4	tc w/ declarant re process and substance
11/2/2017	AD	1	team meeting to cover mock trial, motions in limine, depo digesting, exhibits, witness scheduling, and outstanding motions
11/2/2017	ME	1	team meeting to cover mock trial, motions in limine, depo digesting, exhibits, witness scheduling, and outstanding motions
11/2/2017	JF	1	team meeting to cover mock trial, motions in limine, depo digesting, exhibits, witness scheduling, and outstanding motions
11/2/2017	MD	1	team meeting to cover mock trial, motions in limine, depo digesting, exhibits, witness scheduling, and outstanding motions
11/2/2017	JF	0.1	MD/JF Check-in re 1. witness interview status; 2. the list of top 12 witnesses
11/2/2017	MS	1.7	draft motion in limine to exclude happy camper declarations
11/2/2017	MD	0.1	MD/JF Check-in re 1. witness interview status; 2. the list of top 12 witnesses
11/2/2017	MS	0.3	MD/MS discuss Kellogg Motion in limine subjects
11/2/2017	JF	0.1	AD/JF Discuss the process in order to proceed in communication with the bankruptcy attorneys, on behalf of opt-in
11/2/2017	JF	0.2	Draft/send email to attorneys re bankruptcy amendment for opt-in
11/2/2017	JF	1.7	Mail letters to people who are not covered by the lawsuit (excluded category of employees or category of people outside of FLSA statute of limitations)
11/2/2017	JF	0.1	ME/JF Discuss the task to locate an email with MD's instructions re top 12 witnesses
11/2/2017	JK	0.1	JK/JF JF to request damage calculation spreadsheet copy (for purposes of communicating with the bankruptcy attorneys)
11/2/2017	JF	0.2	MS/JF Review the research needed to assemble information about Kellogg's Happy Campers
11/2/2017	MS	1.5	draft motion in limine to exclude linked in profiles

Date	Staff	Amount of Time	Description
11/2/2017	JF	0.5	Respond to clients who are outside of the statute of limitations
11/2/2017	AD	0.1	AD/JF Discuss the process in order to proceed in communication with the bankruptcy attorneys, on behalf of opt-in
11/2/2017	MS	0.2	MS/JF Review the research needed to assemble information about Kellogg's Happy Campers
11/2/2017	MD	0.3	MD/MS discuss Kellogg Motion in limine subjects
11/3/2017	MS	0	draft outline of sales promotion argument
11/3/2017	JK	1.2	JK Identify discrepancy between plaintiffs and defendants list of plaintiffs with damages,
11/3/2017	MS	1.2	MD/MS meet and confer with Kellogg counsel on motions in limine
11/3/2017	AD	0.3	Draft email to co-counsel .3
11/3/2017	ME	0.2	read notes from motion in limine meet and confer
11/3/2017	JK	0.8	JK Run several checks to confirm dismissal for several plaintiffs.
11/3/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#470 D. REPLY TO RESPONSE to [458] MOTION to Strike)
11/3/2017	ME	0.1	telephone call from opt-in regarding scheduled trial witness prep call with attorney
11/3/2017	AD	1.3	Research procedures for objections and counter designations 1.3
11/3/2017	MS	0.1	review JK email re damages for 3 people Kellogg contests
11/3/2017	AD	0.2	Call with client .2
11/3/2017	ME	0.3	JF/ME discuss nuances of speaking with opt-ins about reasons for dismissal from case due to being outside the SOL and/or not in a covered position
11/3/2017	AD	0.2	AD/JF Discuss the outcome of conversations re bankruptcy amendment for specific opt-ins
11/3/2017	MD	0.3	MD/MS discuss interviews with client re sales promotion approach
11/3/2017	AD	0.3	Draft bankruptcy call notes .3
11/3/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#468 NOTICE of Hearing on [442] MOTION [445] MOTION)
11/3/2017	AD	0.3	Call with trustee attorney .3
11/3/2017	JF	0.3	JF/ME discuss nuances of speaking with opt-ins about reasons for dismissal from case due to being outside the SOL and/or not in a covered position
11/3/2017	JF	1.1	Calls to excluded clients (outside of SOL, not covered as a category of employees, etc.)
11/3/2017	MS	0.2	file memo on meet and confer
11/3/2017	MD	6	trial prep
11/3/2017	MS	0.2	MD/MS discuss strategy for meet and confer with Kellogg counsel on motions in limine
11/3/2017	JF	3.4	Outreach to opt-ins re bankruptcy/exclusion from the lawsuit
11/3/2017	MD	0.2	MD/MS discuss strategy for meet and confer with Kellogg counsel on motions in limine
11/3/2017	MD	1.2	MD/MS meet and confer with Kellogg counsel on motions in limine
11/3/2017	CLER	0.2	prepare mailing of safety video to client
11/3/2017	MS	0.3	MD/MS discuss interviews with client re sales promotion approach
11/3/2017	JF	0.2	AD/JF Discuss the outcome of conversations re bankruptcy amendment for specific opt-ins
11/3/2017	CLER	0.1	469 - Stipulated MOTION extend the deadlines to file in Limine and Proposed Order)Transfer documents recd from ECF system to docket file and create file copy
11/3/2017	ME	0.2	telephone call from opt-in about dismissal from lawsuit due to outside SOL/covered position

Date	Staff	Amount of Time	Description
11/3/2017	AG	0.1	ECF Filing of Stipulated MOTION extend the deadlines to file in Limine and Proposed Order
11/3/2017	JF	1.2	Email clients who are to be excluded from the lawsuit (outside of SOL, not covered as a category of employees, etc.)
11/6/2017	JS	4.3	Identify Defendant exhibits, locate in produced materials, and save in folder; hyperlinked index
11/6/2017	MS	4.3	drafting motion in limine
11/6/2017	JS	0.5	JS/JK discuss technology training--questions to ask, information needed.
11/6/2017	JK	0.5	JS/JK discuss technology training--questions to ask, information needed.
11/6/2017	MS	0.4	review Kellogg revised exhibit list for documents previously not identified
11/6/2017	ME	3.1	mark counter deposition designations for defendants' deposition designations for trial
11/6/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
11/6/2017	AD	0.2	Review amended pre-trial statement .2
11/6/2017	JS	0.7	Locate and save files matching Defendant's Exhibit list
11/6/2017	MA	0.6	proofread motion in limine
11/6/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
11/6/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
11/6/2017	JS	1.4	Download additional exhibits via FTP as sent by Defendant; download ~250 files.
11/6/2017	CM	0.2	assist JF in formatting brief
11/6/2017	AD	1.3	counter-designate Kellogg depo designations 1.3
11/6/2017	MD	6	trial prep 6
11/6/2017	MS	0.2	check with chambers re necessity of local counsel appearance at 11/9 conference
11/6/2017	MS	0.1	email to local counsel re appearance at 11/9 conference
11/6/2017	JF	1.6	Format PLT motion in limine to be submitted for court filing
11/6/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#471 ORDER granting in part and denying in part [442] Motion [450] Motion)
11/6/2017	MA	0.2	assist JF in formatting motion in limine
11/6/2017	JS	0.6	Review and save Defendants Amended Pretrial Statement, Witness List, and Exhibit List
11/6/2017	JS	0.4	Locate and identify separation agreement as Def exhibit matching language provided by attorney; email to atty.
11/6/2017	JF	0.1	Respond to opt-ins re trial dates re-scheduling
11/6/2017	JS	0.8	Review and reconcile Plt's Exhibit list as submitted in order to ensure no omissions.
11/7/2017	JK	0.2	JK/MD Discuss Response to Defendants Motion in Limine
11/7/2017	MD	0.2	JK/MD Discuss Response to Defendants Motion in Limine
11/7/2017	CM	0.1	call from client to confirm receipt of document
11/7/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#472 D. MOTIONS IN LIMINE)
11/7/2017	CM	0.4	prepare folder for witness preparation
11/7/2017	MS	0.1	JK/MS Discuss Response to Defendants Motion in Limine
11/7/2017	JK	0.7	JK Deploy laptop 2 for use during trial IT orientation.

Date	Staff	Amount of Time	Description
11/7/2017	JS	0.1	Convert Defendant's Amended pre-trial order to MSWord document for ease of review and response.
11/7/2017	JF	0.3	Outreach named plaintiff to set up attorney dinner meeting
11/7/2017	CM	0.1	CM/JF Discuss the task to insert tabs into Patty Thomas' witness packet to prepare it for attorney review
11/7/2017	JK	2.9	JK Begin to write response to Motions in Limine regarding damages.
11/7/2017	JK	0.7	JK Deploy laptop for use during trial IT orientation.
11/7/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#475 P. PROPOSED ORDER (Unsigned) re [474] MOTIONS IN LIMINE)
11/7/2017	JF	4.3	Work on counter-designations
11/7/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#477 ORDER granting [469] Stipulated Deadline to File Motions in Limine and Proposed Order)
11/7/2017	JF	0.1	CM/JF Discuss the task to insert tabs into Patty Thomas' witness packet to prepare it for attorney review
11/7/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#476 D. RESPONSE [459] MOTION to Strike Defenses or Compel Production)
11/7/2017	JS	0.4	Revise flight preferences for travel to Tacoma for trial technology training (change seats)
11/7/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#473 D. PROPOSED ORDER (Unsigned) re [472] MOTIONS IN LIMINE)
11/7/2017	MD	6	trial prep 6.
11/7/2017	JS	0.7	Draft notes for questions re: trial technology training
11/7/2017	JS	6.1	Review and copy Defendant exhibit files into one location, hyperlinked index
11/7/2017	AD	0.1	call with opt-in .1
11/7/2017	JF	0.4	Outreach difficult opt-in who might be in danger of exclusion
11/7/2017	JK	1.1	JK Read Defendant's Motions in Limine
11/7/2017	ME	0.7	mark counter deposition designations for defendants' deposition designations for trial
11/7/2017	AD	3.9	counter designate depositions 3.9
11/7/2017	JS	0.5	Email correspondence with Travel Agent in order to secure room for attorney.
11/7/2017	JK	0.1	JK/MS Discuss Response to Defendants Motion in Limine
11/7/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#474 P. MOTIONS IN LIMINE)
11/8/2017	JF	0.1	Draft/send email to AD re bankruptcy evidence
11/8/2017	MD	6	trial prep 6.0
11/8/2017	CLER	0.2	Data Entry of updated contact information .10 Prepare remailing of ltr (RTS) to client .10
11/8/2017	AD	3	Counter-deposition designations 3.0
11/8/2017	CLER	0.2	Data Entry of updated contact information .10 Prepare remailing of ltr (RTS) to client .10
11/8/2017	AD	1.3	Counter-deposition designations 1.3
11/8/2017	CLER	0.2	Data Entry of updated contact information .10 Prepare remailing of ltr (RTS) to client .10
11/8/2017	JK	0.2	JK/JF Detailed review of employment/work history for opt-in classified as excluded
11/8/2017	JF	0.2	Draft/email MD question re opt-in's damages
11/8/2017	JF	0.2	JK/JF Detailed review of employment/work history for opt-in classified as excluded

Date	Staff	Amount of Time	Description
11/8/2017	JS	0.1	JS/JF Discuss the process of calendaring hearing on motions across time zones
11/8/2017	JF	2.2	Work on counter designations (pre-trial preparation)
11/8/2017	JF	0.1	MD/JF Brief check-in re witness outreach
11/8/2017	JF	1.3	Work on counter deposition designations
11/8/2017	JF	0.1	Calendar hearing in the master calendar
11/8/2017	ME	1.9	mark counter deposition designations for defendants' deposition designations for trial
11/8/2017	JF	0.1	JS/JF Discuss the process of calendaring hearing on motions across time zones
11/8/2017	MD	0.1	MD/JF Brief check-in re witness outreach
11/9/2017	JS	11	4:00am-3:00pm Travel to Tacoma, WA, for tech training
11/9/2017	MD	0.3	MD/JF Meet re evaluation/selection process of top witnesses
11/9/2017	JF	0.1	OUtreach/schedule pre-trial witness interview follow-up (per MD)
11/9/2017	MA	0.6	revise motion in limine reply
			Locate/email relevant document to MS in anticipation of the motion hearing in Tacoma,
11/9/2017	JF	0.5	WA
11/9/2017	MS	0.1	MS/JF conversation over the phone re document needed for hearing
11/9/2017	MR	0.2	Send text to atty MS for logmein logon issues
11/9/2017	JF	0.3	MD/JF Meet re evaluation/selection process of top witnesses
11/9/2017	JF	0.1	MS/JF conversation over the phone re document needed for hearing
11/9/2017	JF	0.4	Outreach witnesses to schedule their follow-up pre-trial attorney interviews
11/9/2017	JF	0.1	MD/JF Brief check-in re the top 10 list of priority witnesses
11/9/2017	JF	0.4	Compile/email results of the demographic analysis of the top 10 witnesses
11/9/2017	MD	0.1	MD/JF Brief check-in re the top 10 list of priority witnesses
11/9/2017	JF	0.2	Call with opt-in notified of his exclusion
11/9/2017	CLER	0.1	create PDF format of correspondence recd from D. (flash drive containing exhibits)
11/9/2017	JS	3.5	Trial prep for lead plaintiff
11/9/2017	JF	0.2	Download DEF USB trial exhibit documents/send link to team
11/9/2017	JF	0.2	MD/JF Watch training video sent in by DEF counsel as part of their trial exhibit list
11/9/2017	JS	1	Attend Hearing on mot to compel or exclude, etc.
11/9/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
11/9/2017	JF	0.1	Update DEF production tracking spreadsheet
11/9/2017	MD	6	trial prep 6.0
11/9/2017	MD	0.2	MD/JF Watch training video sent in by DEF counsel as part of their trial exhibit list
11/9/2017	JF	0.1	Respond witness re trial dates/availability for trial
11/9/2017	JF	0.1	Draft/sent email to JK re research into the training video (per MD's request)
11/10/2017	MD	6	trial prep 6
11/10/2017	JS	10	Travel from WA-NY
			CM/JF Review of the task to transcribe time records kept by witnesses (pre-trial
11/13/2017	JF	0.1	preparation)
11/13/2017	ME	2.6	mark counter designations to defendants' deposition designations for trial preparation
			Read email from MS forwarding expert report .2; send three emails containing comments
11/13/2017	MR	0.6	about expert report .4
11/13/2017	JF	0.2	Call with potential trial witness (scheduling of follow-up conversation with attorney)

Date	Staff	Amount of Time	Description
11/13/2017	JF	0.4	MD/AD/JF/ME review outline of information needed for counter designations for trial preparation
11/13/2017	AD	0.4	MD/AD/JF/ME review outline of information needed for counter designations for trial preparation
11/13/2017	MS	0.4	MM/MS discuss case history, current status, motions in limine, jury instructions.
11/13/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#478 MINUTE ENTRY for proceedings Motion Hearing held on 11/9/2017)
11/13/2017	MD	0.3	ms/md confer about when to call named plaintiff to testify 0.3
11/13/2017	JF	0.1	Respond to MA re trial paralegal preparation scheduling
11/13/2017	MS	0.4	md/ms confer about trial litigation strategy 0.4
11/13/2017	MM	0.9	Read SJ motions and ruling
11/13/2017	JF	0.2	Call with potential witness re trial update
11/13/2017	MD	0.4	MD/AD/JF/ME review outline of information needed for counter designations for trial preparation
11/13/2017	MS	0.3	ms/md confer about when to call named plaintiff to testify 0.3
11/13/2017	JF	0.1	Compose/send email to opt-in who is unable to be a trial witness
11/13/2017	JF	0.2	ME/JF Review the list of opt-ins likely to be excluded from the lawsuit (pre-trial preparation)
11/13/2017	CM	0.1	CM/JF Review of the task to transcribe time records kept by witnesses (pre-trial preparation)
11/13/2017	MD	8	trial prep 8
11/13/2017	JF	0.2	ME/JF Check-in re the status of the case
11/13/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#479 P. REPLY TO RESPONSE to [459] MOTION to Strike Defenses or Compel Production)
11/13/2017	JS	2.7	Review deposition exhibits and exhibit list; reconcile to ensure all deposition exhs accounted for in PLT trial exhibit list
11/13/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#480 D. TRANSCRIPT REQUEST)
11/13/2017	MM	2	research for opp. to MIL No. 2 and 3
11/13/2017	AD	0.1	Call with client re bankruptcy .1
11/13/2017	JK	0.5	MS/JK Review Fre1006 exhibits in preparation for meeting with remote team members.
11/13/2017	ME	0.2	ME/JF Check-in re the status of the case
11/13/2017	MD	0.4	md/ms confer about trial litigation strategy 0.4
11/13/2017	JS	0.3	JS/JF debrief re: hearing, tech issues
11/13/2017	JF	0.3	JS/JF debrief re: hearing, tech issues
11/13/2017	JF	0.2	Field call from opt-in re bankruptcy proceeding amendment
11/13/2017	MM	0.4	MM/MS discuss case history, current status, motions in limine, jury instructions.
11/13/2017	JF	0.1	Compose/send email on instructions re the transcription of hours worked project for CM
11/13/2017	JS	0.4	Copy receipts and pull cc statement for travel reimbursement
11/13/2017	JF	0.3	Calls to opt-ins re case updates
11/13/2017	ME	0.2	ME/JF Review the list of opt-ins likely to be excluded from the lawsuit (pre-trial preparation)
11/13/2017	JS	0.6	Write up notes re: tech training and issues, circulate to team.



Date	Staff	Amount of Time	Description
11/13/2017	JF	0.3	MS/JS/JF Meet to review the outcome of the motion hearing in Tacoma, WA (MOTION to Exclude Testimony Of Defendants Experts & MOTION for Court to Calculate Damages Based on Jury Verdict)
11/13/2017	ME	0.4	MD/AD/JF/ME review outline of information needed for counter designations for trial preparation
11/13/2017	JK	1.8	JK More notes on response to Motions in Limine
11/13/2017	CM	0.9	prepare spreadsheet of hours from opt-in calendar for use in witness preparation
11/13/2017	JK	1.1	JK create table of total damages per Plaintiff from the trial damage data set
11/13/2017	JS	0.3	MS/JS/JF Meet to review the outcome of the motion hearing in Tacoma, WA (MOTION to Exclude Testimony Of Defendants Experts & MOTION for Court to Calculate Damages Based on Jury Verdict)
11/13/2017	JF	0.1	Call for case update
11/13/2017	MS	0.3	MS/JS/JF Meet to review the outcome of the motion hearing in Tacoma, WA (MOTION to Exclude Testimony Of Defendants Experts & MOTION for Court to Calculate Damages Based on Jury Verdict)
11/14/2017	JF	0.2	JF/ME discuss information in plaintiffs's depositions as it applies to trial
11/14/2017	AD	1.3	Counter-designate deposition 1.3
11/14/2017	CM	0.1	call from client re question re case
11/14/2017	JK	0.1	Review damage calcs for Kellogg
11/14/2017	MM	0.3	MM/MS discuss Kellogg research and opposition to motions in limine
11/14/2017	MM	0.4	Assist in drafting opening statement, jury instructions
11/14/2017	MS	0.2	JK/MS discuss addressing Kellogg's motion in limine regarding Jason's work
11/14/2017	JK	0.2	JK/MS discuss addressing Kellogg's motion in limine regarding Jason's work
11/14/2017	MS	0.8	review deposition transcripts and filings for response to Kellogg's MIL re Willard Bishop
11/14/2017	JF	0.2	Call with opt-in re case update
11/14/2017	MR	0.1	Review damage calcs for Kellogg
11/14/2017	MD	0.2	MD/MS discuss addressing Kellogg's motion in limine regarding Jason's work
11/14/2017	ME	0.2	JF/ME discuss information in plaintiffs's depositions as it applies to trial
11/14/2017	MS	0.2	MD/MS discuss addressing Kellogg's motion in limine regarding Jason's work
11/14/2017	JF	0.1	JF/ME confirm process for marking counter designations to defendants' deposition designations for trial
11/14/2017	MD	0.5	MD/MS discuss settlement strategy
11/14/2017	JS	0.5	Call re trial schedule, case status
11/14/2017	MM	0.2	MM/MS discuss opening statement strategy
11/14/2017	MD	0.1	JS/MD discuss amending exhibit list
11/14/2017	JS	0.4	Review exhibits; add new exhibit to list
11/14/2017	MM	2.9	Research for opposition to motions in limine; 30(b)(6) witnesses; hearsay
11/14/2017	ME	0.4	search for document listed on defendants' exhibit list for trial
11/14/2017	JK	2.2	JK Begin narrative regarding how FRE1006 exhibits were calculated.
11/14/2017	ME	0.1	JF/ME confirm process for marking counter designations to defendants' deposition designations for trial
11/14/2017	MS	0.5	MD/MS discuss settlement strategy
11/14/2017	MS	1	ET/MS discuss motions in limine strategy and drafting responsibilities
11/14/2017	MD	0.2	JS/MD discuss issues with FWW, rational settlement value
11/14/2017	JS	0.1	JS/MD discuss scheduling conference call for mock trial; possible witnesses for mock trial
11/14/2017	JS	0.2	Correspondence with Moderator for mock trial; scheduling conference call
11/14/2017	MS	0.2	ET/MS discuss expert testimony on MOTUS data

Date	Staff	Amount of Time	Description
11/14/2017	MD	0.1	JS/MD discuss scheduling conference call for mock trial; possible witnesses for mock trial
11/14/2017	ME	2.1	mark counter designations to defendants' deposition designations for trial preparation
11/14/2017	JS	5.7	Locate and/or identify Defendant Trial Exhibits, link to spreadsheet for attorney review.
11/14/2017	JS	0.1	JS/MD discuss amending exhibit list
11/14/2017	MS	0.2	MM/MS discuss opening statement strategy
11/14/2017	AD	0.7	Counter-designate deposition .7
11/14/2017	JK	0.1	JK/MR briefly discuss Defendant expert witness report
11/14/2017	JF	2.8	Work on counter deposition designations project
11/14/2017	CLER	0.3	PCF client (Data Entry of updated contact information .10, case update .20)
11/14/2017	AD	1.8	Counter-designate deposition 1.8
11/14/2017	MR	0.1	JK/MR briefly discuss Defendant expert witness report
11/14/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
11/14/2017	AD	1	Counter-designate deposition 1.0
11/14/2017	AD	1.2	Counter-designate deposition 1.2
11/14/2017	JS	0.2	JS/MD discuss issues with FWW, rational settlement value
11/14/2017	MD	6	trial prep 6
11/14/2017	ME	0.2	telephone call from opt-in for case update
11/14/2017	MM	0.8	legal research for opposition to motions in limine; quick draft/outline of argument
11/14/2017	JF	0.3	Respond to emails from potential witnesses (scheduling of pre-trial interviews, etc.)
11/14/2017	MS	0.3	revise jury instruction on manual labor
11/14/2017	ME	1.1	mark counter designations to defendants' deposition designations for trial preparation forward deposition transcripts and filings to Meagan for response to Kellogg's MIL re
11/14/2017	MS	0.2	Willard Bishop
11/14/2017	MS	0.5	MR/MS discuss settlement strategy
11/14/2017	MR	0.5	MR/MS discuss settlement strategy
11/14/2017	MS	0.3	review new Speakman report on MOTUS data
11/14/2017	MS	0.6	drafting jury instruction on representative evidence Identify, locate, copy, and hyperlink Defendant Trial Exhibits to facilitate Attorney review
11/15/2017	JS	7.4	of same.
11/15/2017	ME	1.3	mark counter designations to defendants' deposition designations for trial preparation Data Entry of updated contact information .10 Prepare remailing (RTS) of ltr to new
11/15/2017	CLER	0.2	client .10 Data Entry of updated contact information .10 Prepare remailing (RTS) of ltr to new
11/15/2017	CLER	0.2	client .10
11/15/2017	JK	0.8	JK Write narrative section on Reorganization of payroll for damage calculations
11/15/2017	ME	3.7	mark counter designations to defendants' deposition designations for trial preparation
11/15/2017	JK	0.8	JK Write narrative section on files produced by Kellogg over the course of the case.
11/15/2017	CM	0.9	prepare hours spreadsheet from client calendars
11/15/2017	JK	1.4	JK Respond to ET question regarding motions in Limine
11/15/2017	JK	2.2	JK Write narrative section on using the damage calculation spreadsheet

Date	Staff	Amount of Time	Description
11/15/2017	JK	1.3	JK Write narrative section on converting biweekly pay to weekly pay
11/15/2017	MD	8	trial prep 8
11/15/2017	JK	0.9	JK Write narrative section on final summation of damages
11/15/2017	JF	0.1	MD/JF Check-in re tasks to be executed for the day
11/15/2017	JK	0.9	JK Write narrative section on post production weeks
11/15/2017	MD	0.1	MD/JF Check-in re tasks to be executed for the day
11/15/2017	JK	0.4	JK/MD Review progress of damage calculation narrative
11/15/2017	ME	1.5	mark counter designations to defendants' deposition designations for trial preparation
11/15/2017	MD	0.4	JK/MD Review progress of damage calculation narrative
11/15/2017	JF	0.2	AD/JF Discuss the status of the outreach of/to the deceased plaintiffs
11/15/2017	AD	0.2	AD/JF Discuss the status of the outreach of/to the deceased plaintiffs
11/15/2017	ME	0.2	MR/ME discuss possible location of specific documents listed on defendants' exhibit list
11/15/2017	JF	6.1	Work on counter depo designations
11/15/2017	AD	2.2	counter designate depositions 2.2
11/15/2017	JS	0.4	Revise Plt Exhibit List
11/15/2017	ME	0.8	mark counter designations to defendants' deposition designations for trial preparation
11/15/2017	MR	0.2	MR/ME discuss possible location of specific documents listed on defendants' exhibit list
11/15/2017	JK	2.2	JK Correct new version or narrative to co counsel regarding response to motion in Limine.
11/15/2017	MR	1.7	Work on search problem with Defendant email production
11/15/2017	CLER	0.2	Data Entry of updated contact information .10 Prepare remailing (RTS) of ltr to new client .10
11/16/2017	JS	0.8	Review all plt exhibits; copy docs and add to separate folder; determine page count of each doc and note; convert .ppt and .xlsx to .pdf
11/16/2017	JS	0.5	JS/MS conference call with Mock Trial Moderator on plan for focus group, overview, materials needed, next steps in planning.
11/16/2017	JS	1.6	Def exhibits: correct missing entries with hyperlinks for atty review
11/16/2017	JS	0.2	Call for quote for exhibits: printed, bound in binders, tabbed
11/16/2017	MM	0.6	review and comment on jury instructions
11/16/2017	CLER	0.2	Data Entry of updated contact information .10 Prepare remailing (RTS) of ltr to new client .10
11/16/2017	MM	1.5	AD/MM/MS/MD(in part)/JF/JS/ME provide status updates regarding tasks to be completed for trial .7; review status of settlement .2; practice legal strategies/arguments for trial .6
11/16/2017	MS	1.5	AD/MM/MS/MD(in part)/JF/JS/ME provide status updates regarding tasks to be completed for trial .7; review status of settlement .2; practice legal strategies/arguments for trial .6
11/16/2017	ME	0.1	ME/JF Request to have safety CD burned for potential trial witness packet
11/16/2017	AD	1.5	AD/MM/MS/MD(in part)/JF/JS/ME provide status updates regarding tasks to be completed for trial .7; review status of settlement .2; practice legal strategies/arguments for trial .6
11/16/2017	JK	0.8	JK Identify the total value of AIP bonuses as they contribute to damages
11/16/2017	MR	0.5	Use phone bill report to perform sample test for days/hours worked not included in Def expert report
11/16/2017	CLER	0.2	prepare mailing of document for clients review (trial material)
11/16/2017	JK	0.8	JK Identify the total value of Prize bonuses as they contribute to damages

Date	Staff	Amount of Time	Description
11/16/2017	JS	1.5	AD/MM/MS/MD(in part)/JF/JS/ME provide status updates regarding tasks to be completed for trial .7; review status of settlement .2; practice legal strategies/arguments for trial .6
11/16/2017	JF	1.5	AD/MM/MS/MD(in part)/JF/JS/ME provide status updates regarding tasks to be completed for trial .7; review status of settlement .2; practice legal strategies/arguments for trial .6
11/16/2017	ME	0.5	determine if opt-ins testified to specific documents on defendants' trial exhibit list
11/16/2017	MR	4	Continue work regarding Defendant's expert report 1.2; Review of available phone bills .7; Continued work on phone bill analysis 1.1; Match up phone bills record names with those of Defendant expert report re: Motus 1.0;
11/16/2017	MM	1	review opposition to defendants' MIL; review jury instructions
11/16/2017	JK	2.1	JK Phone call with remote team embers to discuss response to motion in limine.
11/16/2017	MM	0.5	review and edit jury instructions; legal research to supplement
11/16/2017	CLER	0.2	prepare fedex shipping label (mailing of material for Trial)
11/16/2017	JF	0.1	ME/JF Request to have safety CD burned for potential trial witness packet
11/16/2017	JF	0.3	Respond to emails from potential witnesses
11/16/2017	ME	1.5	AD/MM/MS/MD(in part)/JF/JS/ME provide status updates regarding tasks to be completed for trial .7; review status of settlement .2; practice legal strategies/arguments for trial .6
11/16/2017	JF	1.8	Complete counter deposition designations project
11/16/2017	ME	0.3	AD/ME discuss status of tasks needed to comply with the Judge's order for limited discovery regarding Defendants' motion to compel arbitration
11/16/2017	MS	0.2	MM/MS going over opening statement
11/16/2017	JF	0.1	Email pre-paid Fedex label to witness to mail Kellogg tools to us via Fedex
11/16/2017	AD	0.3	AD/ME discuss status of tasks needed to comply with the Judge's order for limited discovery regarding Defendants' motion to compel arbitration
11/16/2017	MR	0.6	MR/JF Discuss the best strategies to 1. organize the case folder; 2. locate opt-in cell phone data; 3. touch on the project to analyze MOTUS and cell data and use it for the purposes of trial evidence
11/16/2017	ME	0.3	prepare documents for plaintiffs' trial witness packet
11/16/2017	JS	0.2	Sign up for Zoom account for conferencing with focus group moderator and recruiter
11/16/2017	JF	0.6	Print/format/prepare for mailing a witness document packet to be mailed out to potential witness
11/16/2017	MD	8	trial prep 8
11/16/2017	MM	0.2	MM/MS going over opening statement
11/16/2017	JF	0.6	MR/JF Discuss the best strategies to 1. organize the case folder; 2. locate opt-in cell phone data; 3. touch on the project to analyze MOTUS and cell data and use it for the purposes of trial evidence
11/16/2017	MR	0.1	MR/JF Check-in re program to be able to locate various exhibits using Bates document numbering
11/16/2017	JF	0.1	Update TM record for opt-in/potential witness
11/16/2017	MD	0.8	MS/MD (in part)/MM/AD/ME/JS/JF Weekly Team Meeting
11/16/2017	JF	0.7	Reach out to witnesses who live in/close to Tacoma, WA to serve as mock trial witnesses on Dec 2 and 3
11/16/2017	MM	1	review and edit jury instructions
11/16/2017	ME	0.2	MD/ME review plaintiff's documents to determine which to add to plaintiffs' trial exhibit list

Date	Staff	Amount of Time	Description
11/16/2017	MS	0.5	JS/MS conference call with Mock Trial Moderator on plan for focus group, overview, materials needed, next steps in planning.
11/16/2017	JF	0.1	AG/JF Meet re production of a Fedex label to be mailed to opt-in to send 3-D objects to us via Fedex (pre-trial preparation)
11/16/2017	ME	1.1	locate documents from deposition designations to add to plaintiffs' trial witness list
11/16/2017	AG	0.1	AG/JF Meet re production of a Fedex label to be mailed to opt-in to send 3-D objects to us via Fedex (pre-trial preparation)
11/16/2017	JF	0.1	MR/JF Check-in re program to be able to locate various exhibits using Bates document numbering
11/16/2017	CLER	0.2	prepare mailing of document for clients review (trial material)
11/17/2017	JK	0.8	JK Begin reviewing damages to address issues highlighted in Defendants motion in limine.
11/17/2017	JF	0.1	Update witness master spreadsheet with scheduling information
11/17/2017	MS	0.9	MS/ME discuss strategies for trial arguments based on information from opt-in depositions
11/17/2017	JS	0.4	Locate/identify pay stubs reflecting rate as TSR, email to atty for review
11/17/2017	MR	3.4	Work on Motus/phone bill project 2.1; Perform further work on motus/phone bill 1.3
11/17/2017	JK	0.8	JK Review narrative which describes FRE 1006 TM and RSR v TSR Rate Comparison.pdf
11/17/2017	JK	2.2	JK Write narrative regarding the FRE1006 exhibit comparing TSR rates to TM/RSR rates.
11/17/2017	ME	0.9	MS/ME discuss strategies for trial arguments based on information from opt-in depositions
11/17/2017	JS	0.5	Review defendant and plaintiff production to ascertain annual pay as TM
11/17/2017	MR	1.2	Continued work on phone bill analysis
11/17/2017	ME	0.8	prepare for meeting with MS to discuss strategies for trial arguments based on information from opt-in depositions
11/17/2017	JS	6.3	Copy files from Plt Exhibit list and mark in spreadsheet
11/17/2017	MS	0.8	MS/JK Review narrative which describes FRE 1006 TM and RSR v TSR Rate Comparison.pdf
11/17/2017	MD	8	trial prep 8
11/17/2017	JK	0.8	JK Create list of all job titles held by each Plaintiff
11/17/2017	JS	0.4	Attempt conversion of pdf document from defendant to excel to facilitate ease of response
11/17/2017	ME	0.1	MS/ME schedule time to meet about reviewing argument for trial
11/17/2017	ME	1.4	review trial witness job histories to determine which witnesses also worked in hourly positions for trial preparation
11/17/2017	JF	0.2	MS/JF Meet re the task to review the witness list for opt-ins who worked as TSRs (trial preparation)
11/17/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#481 MINUTE ORDER)
11/17/2017	MM	4.8	research and draft argument re: FRE 615
11/17/2017	JF	0.3	Work on/send email report to MS re project to compile the list of witnesses who worked as TSRs
11/17/2017	MS	0.1	MS/ME schedule time to meet about reviewing argument for trial
11/17/2017	MM	2.2	research re witness sequestration, trial prep
11/17/2017	MS	0.2	MS/JF Meet re the task to review the witness list for opt-ins who worked as TSRs (trial preparation)

Date	Staff	Amount of Time	Description
11/17/2017	JF	0.2	ME/JF Check-in re tasks to be completed today/next week
11/17/2017	JK	0.7	JK Identify data sources of FRE1006 exhibit on wage rate comparisons. .
11/17/2017	ME	0.2	ME/JF Check-in re tasks to be completed today/next week
11/17/2017	JF	0.1	JS/JF Check-in re witness travel question
11/17/2017	MR	0.2	MS/MR Discuss Motus/phone bill project
11/17/2017	JF	0.1	JS/JF Check-in re the latest order from Judge Leighton
11/17/2017	MS	0.2	MS/MR Discuss Motus/phone bill project
11/17/2017	JS	0.1	JS/JF Check-in re witness travel question
11/17/2017	JF	0.2	Call with potential witness re mock trial proceedings
11/17/2017	JS	0.1	JS/JF Check-in re the latest order from Judge Leighton
11/20/2017	JF	0.2	Reach out to witness re delivery of package (Kellogg tools)
11/20/2017	ME	1	review trial counter deposition designations for any further edits needed
11/20/2017	ME	0.5	assist JF with formatting brief
11/20/2017	JF	0.1	Reach out to opt-in re attorney interview (potential witness)
11/20/2017	MM	1.3	Research for jury instructions (0.3); Edit, revise and update jury instructions (1.0)
11/20/2017	MS	0.3	MS/MM: Discuss jury instructions and verdict form
11/20/2017	ME	0.1	email MD details of task I will be completing regarding counter depo designations
			Transfer documents recd from ECF system to docket file and create file copy (Docket#382 - ORDER Re Evidentiary Objections for P. Partial SJ Motion on Exemptions) (Campanelli v. Hershey)
11/20/2017	CLER	0.1	Hershey)
11/20/2017	AG	0.2	AG/JF Check-in re delivery of Fedex package to us (office delivery over Thanksgiving)
11/20/2017	MR	0.3	Assist JS in trying to improve process of converting jpg exhibits to pdf exhibit files
11/20/2017	MM	0.3	MS/MM: Discuss jury instructions and verdict form
11/20/2017	MA	0.7	proofread response to motions in limine
11/20/2017	JF	0.2	AD/JF Check-in re opt-ins with bankruptcy proceedings
11/20/2017	ME	2.1	review trial counter deposition designations for any further edits needed
11/20/2017	AG	0.1	AG/JF Check-in re mailing address for opt-in/potential trial witness
			Transfer documents recd from ECF system to docket file and create file copy (Docket#380 - ORDER Re Calculation of Overtime Damages (Campanelli v. Hershey)
11/20/2017	CLER	0.1	Hershey)
11/20/2017	JF	0.2	AG/JF Check-in re delivery of Fedex package to us (office delivery over Thanksgiving)
11/20/2017	MM	0.3	Email co-counsel about jury instructions
11/20/2017	MD	0.2	MD/JF Check-in re additional categories of witnesses to prepare for the trial
11/20/2017	JF	0.1	AG/JF Check-in re mailing address for opt-in/potential trial witness
11/20/2017	CM	0.2	CM/JF Check-in re the task to mail a witness packet to witness
			MS/JF Review the formatting and stylistic edits to prepare to file PLT response to Motions
11/20/2017	MS	0.2	in Limine
			review length of witness testimony from Waterstone trial to assist attorneys in preparing
11/20/2017	MA	0.2	for Kellogg trial witness testimony
11/20/2017	JF	0.2	Outreach potential witness to confirm time for witness interview
11/20/2017	JF	0.2	CM/JF Check-in re the task to mail a witness packet to witness
			Transfer documents recd from ECF system to docket file and create file copy (Docket#381 - ORDER granting re 315 Plaintiffs' Motion for Partial Summary Judgment - Campanelli v. Hershey)
11/20/2017	CLER	0.1	Hershey)
11/20/2017	JF	0.2	MD/JF Check-in re additional categories of witnesses to prepare for the trial



Date	Staff	Amount of Time	Description
11/20/2017	MS	0.2	MS/MM discuss jury instructions and co-counsel's changes thereto
11/20/2017	CLER	0.2	prepare mailing of document for clients review (trial material)
11/20/2017	JK	2.9	JK Write narrative describing the creation of the comparison between TSR and RSR rates.
11/20/2017	ME	0.1	MD/ME assign task of reviewing counter deposition designations to prepare for submitting the final versions
11/20/2017	MM	0.5	Review and revise potential voir dire questions
11/20/2017	MD	0.2	MD/MM discuss voir dire questions
11/20/2017	JF	0.2	Draft/send email to attorneys re mock trial specifications to be communicated to participants
11/20/2017	MD	6	trial prep 6
11/20/2017	MD	0.1	MD/ME assign task of reviewing counter deposition designations to prepare for submitting the final versions
11/20/2017	MM	2.5	Review and implement changes and comments to jury instructions and preliminary jury instructions by co-counsel
11/20/2017	JS	8.1	Locate, identify, and copy trial exhibits to one folder for ease of organization and accessibility
11/20/2017	ME	1.6	review trial counter deposition designations for any further edits needed
11/20/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)
11/20/2017	MM	0.2	MS/MM discuss jury instructions and co-counsel's changes thereto
11/20/2017	MR	0.1	JF/MR confer about threshold amounts for RSM/RSR variable labor project
11/20/2017	AG	0.1	ECF P. RESPONSE to [472] MOTIONS IN LIMINE
11/20/2017	JF	0.1	AD/JF Check-in re deceased opt-in outreach (status)
11/20/2017	AD	0.2	AD/JF Check-in re opt-ins with bankruptcy proceedings
11/20/2017	AD	2.2	Counter-designate deposition transcripts 2.2
11/20/2017	MM	0.2	MD/MM discuss voir dire questions
11/20/2017	JF	0.1	JF/MR confer about threshold amounts for RSM/RSR variable labor project
11/20/2017	JF	0.2	MS/JF Review the formatting and stylistic edits to prepare to file PLT response to Motions in Limine
11/20/2017	AD	0.1	AD/JF Check-in re deceased opt-in outreach (status)
11/20/2017	AG	0.1	483 - P. RESPONSE to [472] MOTIONS IN LIMINE
11/20/2017	MR	0.1	MD/MR confer about RSM variable labor project
11/20/2017	MD	0.1	MD/MR confer about RSM variable labor project
11/20/2017	JF	1.9	Format brief for filing
11/20/2017	CM	0.9	prepare witness packet
11/20/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#482 - STIPULATION AND PROPOSED ORDER as the Deadline to File Their Joint Proposed Pretrial Order)
11/20/2017	MS	0.1	MS/MR Discuss need for ptx on laptop for case review
11/20/2017	MR	0.1	MS/MR Discuss need for ptx on laptop for case review
11/20/2017	MM	0.5	Review draft jury instructions and edits and comments thereto
11/20/2017	JF	0.2	MD/JF Check-in re tasks for the day/availability
11/20/2017	MD	0.2	MD/JF Check-in re tasks for the day/availability
11/20/2017	AG	0.1	ECF Filing of STIPULATION AND PROPOSED ORDER as the Deadline to File Their Joint Proposed Pretrial Order
11/20/2017	MR	0.1	Get laptop from MS to add ptx software for case review
11/20/2017	JF	0.9	Cross-check the joint stipulation list of opt-ins to be excluded from the case (outside SOL and other limitations)

Date	Staff	Amount of Time	Description
			locate email sent to witnesses in Waterstone case for JF to use as template for witness
11/21/2017	MA	0.2	scheduling for trial
11/21/2017	MA	0.2	edit email to trial witnesses
			Locate, identify, and copy trial exhibits to one folder for ease of organization and
11/21/2017	JS	9	accessibility
11/21/2017	MA	0.4	edit email to witnesses re: trial schedule
11/21/2017	JF	0.3	incorporate changes to draft of email to witnesses from MD and MA
11/21/2017	AG	0.1	ECF Filing of STIPULATION AND PROPOSED ORDER of Dismissal of Certain Opt-In Plaintiffs
			Transfer documents recd from ECF system to docket file and create file copy (Docket#486
11/21/2017	CLER	0.1	- STIPULATION AND PROPOSED ORDER of Dismissal of Certain Opt-In Plaintiffs)
11/21/2017	JF	0.1	Send an updated draft of an email to be sent out to prospective witnesses to MA
11/21/2017	MA	0.1	MA/JF Discuss scheduling of Doodle witness calendar set-up
			Transfer documents recd from ECF system to docket file and create file copy (Docket#485
11/21/2017	CLER	0.1	ORDER on STIPULATION [482] Pretrial Order)
			Send draft of the email to be sent to prospective witnesses re trial availability to MD and
11/21/2017	JF	0.1	MA
11/21/2017	MM	0.2	Email co-counsel with questions about and changes to jury instructions
11/21/2017	JF	1	Conduct witness interview
11/21/2017	JF	0.2	MD/JF Meet re witness scheduling logistics
11/21/2017	MM	0.2	MS/MM discuss jury instructions
11/21/2017	ME	1.6	review trial counter deposition designations for any further edits needed
11/21/2017	JS	0.6	MD/MA (in part)/JS/JF Meet re travel and witness scheduling logistics
			Review and compare documents with co-counsel's changes and comments to jury
11/21/2017	MM	0.2	instructions
11/21/2017	MM	0.3	Review changes to jury instructions
11/21/2017	MD	0.2	MD/JF Meet re witness scheduling logistics
11/21/2017	JF	0.6	MD/MA (in part)/JS/JF Meet re travel and witness scheduling logistics
11/21/2017	MS	0.2	MS/MM discuss jury instructions
11/21/2017	MM	3	Research and draft Reply to Defendants' Opposition to Plaintiffs' Motion in Limine
			Transfer documents recd from ECF system to docket file and create file copy (Docket#484
11/21/2017	CLER	0.1	D Opposition to P MIL)
11/21/2017	MD	8	trial prep
11/21/2017	JK	1.6	JK Confirm that spread of p[payroll is accurate.
11/21/2017	MM	1.6	Revise jury instructions to incorporate research and changes as discussed
11/21/2017	JF	0.4	MA/JF Set up doodle trial availability questionnaire via doodle
			MS/MM: Discuss priorities regarding jury instructions and reply to Defendants'
11/21/2017	MS	0.2	opposition to our motion in limine
			JK Spread Payroll from weekly to biweekly payroll for corrected set of damage
11/21/2017	JK	2.2	calculations.
11/21/2017	MD	0.6	MD/MA (in part)/JS/JF Meet re travel and witness scheduling logistics
			Draft email to be sent to prospective witnesses as far as their availability for/during the
11/21/2017	JF	0.6	trial
11/21/2017	MA	0.2	MD/MA (in part)/JS/JF Meet re travel and witness scheduling logistics
11/21/2017	MM	0.2	Read and respond to email from co-counsel regarding jury instructions and verdict form

Date	Staff	Amount of Time	Description
11/21/2017	MM	0.4	MS/MM: Call co-counsel to discuss jury instructions, opposition to motions in limine, and voir dire questions
11/21/2017	JK	2.2	JK Recombine payroll for corrected set of damage calculations.
11/21/2017	MA	0.4	MA/JF Set up doodle trial availability questionnaire via doodle
11/21/2017	JF	0.1	MA/JF Discuss scheduling of Doodle witness calendar set-up
11/21/2017	MM	0.3	MS/MM: Discuss strategy and legal argument for Reply to Defendants' Opposition to Plaintiffs' Motion in Limine
11/21/2017	MS	0.3	MS/MM: Discuss strategy and legal argument for Reply to Defendants' Opposition to Plaintiffs' Motion in Limine
11/21/2017	JF	0.3	Call with witness re availability for trial
11/21/2017	MM	0.1	MD/MM: Discuss pre-trial preparation of witnesses
11/21/2017	MM	4.1	Draft Reply to Defendants' Opposition to Plaintiffs' Motion in Limine (4.0); email draft to co-counsel for review and comment (0.1)
11/21/2017	MS	0.4	MS/MM: Call co-counsel to discuss jury instructions, opposition to motions in limine, and voir dire questions
11/21/2017	MM	0.2	MS/MM: Discuss priorities regarding jury instructions and reply to Defendants' opposition to our motion in limine
11/21/2017	ME	0.3	attempt to locate particular discovery document for opt-in to help attorneys prepare for trial
11/21/2017	MD	0.1	MD/MM: Discuss pre-trial preparation of witnesses
11/21/2017	ME	0.3	locate information requested by attorney about a particular opt-in for trial preparation
11/21/2017	MM	0.2	Prepare for and schedule meeting regarding pretrial witness preparation
11/22/2017	MM	0.3	Review Reply to Defendants' Opposition to Plaintiffs' Motion in Limine for precision and accuracy
11/22/2017	AG	0.1	AG/JF Check-in re returned mail to office to opt-in to be dismissed from case
11/22/2017	MA	0.4	proofread motion in limine
11/22/2017	JF	0.1	AG/JF Check-in re returned mail to office to opt-in to be dismissed from case
11/22/2017	MM	0.5	Review and finalize paralegal's edits and formatting changes to Reply to Defendants' Opposition to Plaintiffs' Motion in Limine for submission
11/22/2017	MS	0.5	MS/MM: Review and discuss final draft of Reply to Defendants' Opposition to Plaintiffs' Motion in Limine (0.4); file electronically (0.1)
11/22/2017	CLER	0.1	create PDF format of correspondence recd from D. (Kandel depo notice)
11/22/2017	MM	0.2	MS/MM: discuss co-counsel's comments and revisions to draft of Reply to Defendants' Opposition to Plaintiffs' Motion in Limine
11/22/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#488 NOTICE of Hearing: Pretrial Conference set for 11.30.2017)
11/22/2017	MD	4	trial prep 8
11/22/2017	MM	2.1	Review co-counsel's comments and revisions to draft of Reply to Defendants' Opposition to Plaintiffs' Motion in Limine(0.5); research and revise draft to implement co-counsel's suggestions (1.6)
11/22/2017	MS	0.2	MS/MM: discuss co-counsel's comments and revisions to draft of Reply to Defendants' Opposition to Plaintiffs' Motion in Limine
11/22/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#487 MINUTE ORDER)
11/22/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#489 ORDER on STIPULATION [486] Dismissal of Certain Opt-In Plaintiffs)
11/22/2017	JK	1.2	JK Recalculate spread of Bonuses based on 4-4-5 weeks structure.
11/22/2017	JK	1.2	JK Recalculate spread of Commissions based on 4-4-5 weeks structure.

Date	Staff	Amount of Time	Description
11/22/2017	JK	2.3	JK Recalculate AIP bonuses only in weeks where plaintiffs were Morning Foods.
11/22/2017	JK	1.2	JK Recalculate spread of Prize bonuses based on 4-4-5 weeks structure.
11/22/2017	MM	0.5	MS/MM: Review and discuss final draft of Reply to Defendants' Opposition to Plaintiffs' Motion in Limine (0.4); file electronically (0.1)
11/22/2017	MM	1.8	Edit and revise draft of Reply to Opposition to Plaintiffs' Motion in Limine
11/22/2017	JK	1.9	JK Write detailed log of work done to correct mistakes in the damages.
11/27/2017	AG	0.1	AG/JF Check-in re the safest, most efficient way to deliver document packet to witness
11/27/2017	JS	2.3	Truncate pay stub exhibits
11/27/2017	MM	0.5	Read, revise, and comment on opening statement draft.
11/27/2017	MD	0.3	edit statement of facts 0.3
11/27/2017	JF	0.1	MS/JF discuss the format in which route itineraries are viewed/delivered to witnesses
11/27/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#490 P. REPLY TO RESPONSE to [474] MOTIONS IN LIMINE)
11/27/2017	MD	0.5	review exhibit lists 0.5
11/27/2017	JS	0.5	Review and remove Plt exhibits--cell phone records
11/27/2017	MD	0.5	assign direct testimony obligations
11/27/2017	MD	0.5	review and send defense counsel amended exhibit and witness lists 0.5
11/27/2017	MD	0.1	email defense counsel about withdrawing reply to Motion in limine 0.1
11/27/2017	MD	3	creat pretrial order to send to defense counsel 3.0
11/27/2017	ME	1.9	mark witness' deposition testimony to assist attorneys with preparation for mock trial
11/27/2017	ME	1.9	print exhibits for mock trial 1.5; organize printed exhibits for mock trial .4
11/27/2017	MD	1	draft direct testimony outline of plaintiffs 1.0
11/27/2017	MM	0.1	MS/MM: Discuss defendants' draft jury instructions
11/27/2017	MS	0.1	MS/MM: Discuss defendants' draft of proposed jury instructions
11/27/2017	MD	0.3	email defense counsel about Kellogg witnesses in plaintiffs' case 0.3
11/27/2017	JF	1.6	Outreach to witnesses to work on travel arrangements
11/27/2017	MM	2.7	Compare and analyze differences between Plaintiffs' draft and defendants' draft of their respective proposed preliminary jury instructions, and draft potential arguments in favor of plaintiffs' proposed instruction where they differ.
11/27/2017	AG	0.1	Emailed Proposed Order to Judge (Dkt492)
11/27/2017	MS	0.1	MS/JF discuss the format in which route itineraries are viewed/delivered to witnesses
11/27/2017	MD	3	prepare client for trial
11/27/2017	AG	0.1	ECF Filing of MOTION to Strike Defendants' Rebuttal Expert Report
11/27/2017	MM	1.2	ad/mr/md Met to discuss strategy for witness preparation 1.2
11/27/2017	MD	0.5	prepare for call with client 0.5
11/27/2017	MD	1.2	ad/mr/md Met to discuss strategy for witness preparation 1.2
11/27/2017	JF	0.2	AD/JF Check-in re tasks to be completed (bankruptcy and deceased plaintiff tracking)
11/27/2017	MD	0.2	emailing mock trial coordinator re next steps 0.2
11/27/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#491 - MOTION to Strike Defendants' Rebuttal Expert Report)
11/27/2017	AD	1.2	ad/mr/md Met to discuss strategy for witness preparation 1.2
11/27/2017	CLER	0.1	create PDF format of document recd from client ( Acknowledgment/Agreement)

Date	Staff	Amount of Time	Description
11/27/2017	JS	0.3	Research facility set-up, determine whether infrastructure supports digital display of exhibits, send results to team via email.
11/27/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#492 - PROPOSED ORDER (Unsigned) re [491] MOTION to Strike Defendants' Rebuttal Expert Report)
11/27/2017	JF	0.3	MD/JF Check-in re witness travel arrangements (to be completed for the top 10 witnesses)
11/27/2017	MD	0.5	review witness order for trial 0.5
11/27/2017	AD	0.2	AD/JF Check-in re tasks to be completed (bankruptcy and deceased plaintiff tracking) ECF Filing of PROPOSED ORDER (Unsigned) re [491] MOTION to Strike Defendants' Rebuttal Expert Report
11/27/2017	AG	0.1	Compare and analyze difference between Plaintiffs' and Defendant's draft of the proposed jury instructions, and develop arguments in favor of our proposed instruction where the drafts differ.
11/27/2017	MM	3.3	Format Motion to exclude - rebuttal report
11/27/2017	JF	1.8	MD/JF Check-in re witness travel arrangements (to be completed for the top 10 witnesses)
11/27/2017	MD	0.3	email ms re travel to Tacoma for court conference 0.1
11/27/2017	MD	0.2	email defense counsel about witness testimony 0.2
11/27/2017	MD	0.2	email and speak with JK about rescheduling deposition 0.2
11/27/2017	MD	0.1	email defense counsel about rescheduling JK's deposition 0.1
11/27/2017	JS	0.4	Pull invoices from Pipeline and notes on phone calls to reconcile cost of additional mock trial jurors
11/27/2017	JF	0.1	AG/JF Check-in re delivery of Fedex package from trial witness
11/27/2017	MD	0.1	email defense counsel about edits to statement of facts and Kellogg's affirmative defenses 0.1
11/27/2017	MA	0.7	proofread motion to exclude rebuttal report
11/27/2017	JS	0.3	Create Excel version of 3rd Amend. Exhibit List
11/27/2017	MM	0.1	MS/MM: Discuss Plaintiffs' proposed jury instructions
11/27/2017	MS	0.1	MS/MM: Discuss Plaintiffs' proposed jury instructions
11/27/2017	AG	0.1	AG/JF Check-in re delivery of Fedex package from trial witness
11/27/2017	JF	0.1	AG/JF Check-in re the safest, most efficient way to deliver document packet to witness
11/28/2017	JF	0.6	MS/JF Review the latest order from Judge Leighton re McCarrt and other admissible/non-admissible trial evidence
11/28/2017	ME	0.2	MD/ME discuss following up with opt-in about discovery production
11/28/2017	JK	1.7	JK Identify and fix error with prize pay spread in new version of trial damage calculations.
11/28/2017	MM	0.3	Email co-counsel about jury instructions and arguments in favor of Plaintiffs' version and against Defendant's version
11/28/2017	MM	0.1	Read through and organize documents in preparation for pretrial interview of client/witness
11/28/2017	MD	1.7	MS/MD/DG(in part)/MM/JF/JS/ME provide feedback to MS regarding delivery and content of opening statement for trial
11/28/2017	MM	0.1	Examine the court's order on motions in limine
11/28/2017	MM	1.7	MS/MD/DG(in part)/MM/JF/JS/ME provide feedback to MS regarding delivery and content of opening statement for trial
11/28/2017	ME	0.2	complete final edits to witness' deposition counter designations
11/28/2017	JK	2.4	JK Add payroll for rep route sales plaintiffs to damages.

Date	Staff	Amount of Time	Description
11/28/2017	JF	1.7	MS/MD/DG(in part)/MM/JF/JS/ME provide feedback to MS regarding delivery and content of opening statement for trial
11/28/2017	MD	0.4	MD/MM: Debrief after client interview and discuss it in the context of trial strategy
11/28/2017	JS	1.7	MS/MD/DG(in part)/MM/JF/JS/ME provide feedback to MS regarding delivery and content of opening statement for trial
11/28/2017	MM	2.9	MD/MM: Interview client via phone, in preparation for trial, about background, work history, position with Kellogg, job duties, hours worked, job expectations, pay
11/28/2017	MM	0.6	Compare and analyze differences between Plaintiffs' draft and defendants' draft of their respective proposed final jury instructions, and draft potential arguments in favor of plaintiffs' proposed instruction where they differ.
11/28/2017	MD	0.2	MD/ME discuss following up with opt-in about discovery production
11/28/2017	MD	2.9	MD/MM: Interview client via phone, in preparation for trial, about background, work history, position with Kellogg, job duties, hours worked, job expectations, pay
11/28/2017	AG	0.1	ECF Filing of P. NOTICE of Withdrawal of REPLY [490] Reply to Response to Motion)
11/28/2017	JK	1.3	JK Check new version of damage calculations for errors.
11/28/2017	ME	0.4	complete final edits to witness' deposition counter designations
11/28/2017	MS	1.7	MS/MD/DG(in part)/MM/JF/JS/ME provide feedback to MS regarding delivery and content of opening statement for trial
11/28/2017	MM	0.3	MD/MS/MM: Discuss trial strategy with respect to opening statement, theme, and theory of the case
11/28/2017	MD	0.2	email with mock trial coordinators for payment for mock jurors 0.2
11/28/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#495 D. NOTICE OF LODGING OF PROPOSED ORDER)
11/28/2017	MD	0.4	md/ms post mediation discussion about settlement 0.4
11/28/2017	MM	0.4	MD/MM: Debrief after client interview and discuss it in the context of trial strategy
11/28/2017	MD	1.0	md/ms call with mediator about settlement 1.0
11/28/2017	MD	0.2	review MS opening statement 0.2
11/28/2017	MS	0.4	md/ms post mediation discussion about settlement 0.4
11/28/2017	MD	0.2	send defense counsel photos of plaintiffs' tools 0.2
11/28/2017	MM	0.3	Review and assess co-counsel's comments and revisions to Plaintiffs' proposed preliminary jury instructions
11/28/2017	JK	2.2	JK Create charts which shows the overtime payments for individual plaintiffs who held the rep route sales position.
11/28/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#493 P. NOTICE of Withdrawal of REPLY re [490] Reply to Response to Motion)
11/28/2017	ME	0.8	highlight witness deposition testimony for mock trial preparation
11/28/2017	MM	5.3	Compare and analyze differences between Plaintiffs' draft and defendants' draft of their respective proposed final jury instructions, and draft a proposed compromise version with arguments in favor of plaintiffs' proposed instruction where we disagree.
11/28/2017	JS	3.2	Cull paystubs exhibits, save, reconcile Bates ranges, add to spreadsheet
11/28/2017	MD	4.0	review and edit deposition designations 4.0
11/28/2017	ME	2.8	highlight witness deposition testimony for mock trial preparation
11/28/2017	MS	1	interview with clients re MOTUS use and data



Date	Staff	Amount of Time	Description
11/28/2017	MS	1	md/ms call with mediator about settlement 1.0
11/28/2017	ME	1.7	MS/MD/DG(in part)/MM/JF/JS/ME provide feedback to MS regarding delivery and content of opening statement for trial
11/28/2017	MD	0.1	email defense counsel about rescheduling JK's deposition 0.1
11/28/2017	CLER	0.1	create PDF format of correspondence recd from D. ( 2 alternate KASA videos)
11/28/2017	MD	0.4	prepare for call with client re trial testimony 0.4
11/28/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#494 ORDER granting in part and denying in part [472] D. Motion[474] P. Motion in Limine)
11/28/2017	JS	1.3	Plaintiff Exhibits: remove Cell phone records, re-number exhibit list
11/28/2017	CLER	0.1	Prepare fedex label (trial materials)
11/28/2017	DG	0.6	listen/critique MS opening argument .6
11/28/2017	ME	0.2	telephone call with opt-in about sending discovery documents
11/28/2017	MS	0.3	MD/MS/MM: Discuss trial strategy with respect to opening statement, theme, and theory of the case
11/28/2017	MS	0.6	MS/JF Review the latest order from Judge Leighton re McCarrrt and other admissible/non-admissible trial evidence
11/28/2017	MD	0.3	MD/MS/MM: Discuss trial strategy with respect to opening statement, theme, and theory of the case
11/29/2017	JK	0.1	JK/MD Discuss Rep Route Sales Plaintiffs into the trial damages.
11/29/2017	MD	0.1	MD/ME discuss task of sending deposition counter designations to opposing counsel
11/29/2017	AN	0.1	Telephone call from plaintiff regarding upcoming trial
11/29/2017	MM	0.2	Review and assess co-counsel's brief in a different but similar case to for applicability to jury instructions issues in this case
11/29/2017	MM	3.8	Revise proposed jury instructions to incorporate defendant's proposed instructions, identify issues still in contention and develop arguments in favor of Plaintiffs' version.
11/29/2017	JK	0.2	JK/MD Discuss how to incorporate new payroll history, produced 11.17.17, into the trial damages.
11/29/2017	ME	0.1	MD/ME discuss task of sending deposition counter designations to opposing counsel
11/29/2017	MM	0.2	Email local counsel about jury instructions
11/29/2017	MD	0.1	JK/MD Discuss Rep Route Sales Plaintiffs into the trial damages.
11/29/2017	JK	2.5	JK Begin to recalculate damages based on payroll which reflects the new payroll history.
11/29/2017	MM	3.6	Revise proposed jury instructions to incorporate defendant's proposed instructions, identify issues still in contention and develop arguments in favor of Plaintiffs' version.
11/29/2017	MM	0.4	Call co-counsel to discuss jury instructions and voir dire questions
11/29/2017	MD	0.2	JK/MD Discuss how to incorporate new payroll history, produced 11.17.17, into the trial damages.
11/29/2017	JS	1.3	Revise Exhibit List--format and re-number, convert to Word version and pdf version.
11/29/2017	MD	1	draft cross examination for mock trial 1.0
11/29/2017	ME	0.1	MA/ME discuss best practices for speaking with opt-ins about attending trial on dates they are needed
11/29/2017	JS	2.3	Revise Exhibit List
11/29/2017	JS	0.1	Save emailed itinerary to travel plan folder
11/29/2017	MA	0.4	prepare chart of objections to exhibits

Date	Staff	Amount of Time	Description
11/29/2017	JS	5.1	Cull P's Exhibits for pay records down, copy new Bates ranges.
11/29/2017	MM	0.5	Review, revise and comment on proposed verdict form
11/29/2017	JS	0.1	Email to Travel Agency approving itinerary change
11/29/2017	JS	0.4	Review D's 3rd Amend Exhibit List, save as spreadsheet, add MD's comments and review notes
11/29/2017	JS	0.6	Convert D's Exhibit List and witness list to PDF, add cover pages
11/29/2017	JS	0.1	EMail to Travel Agent approving itinerary for witness
11/29/2017	MA	0.1	MA/ME discuss best practices for speaking with opt-ins about attending trial on dates they are needed
11/29/2017	JK	1.7	JK Compare payroll history used in the damage calculations to the supplemental file sent on 11/17/17 with 11,375 rows of "updated" data.
11/29/2017	ME	0.3	prepare opt-in documents for production .2; send documents to opposing counsel .1
11/29/2017	MS	8.1	develop direct exam outline for Kellogg witness on mock trial
11/29/2017	ME	1.1	compile exhibits for cross examination of witnesses at mock trial
11/29/2017	MD	6.0	finalizing pretrial order for filing (reviewing & editing exhibit lists, witness lists, and stipulation with defense counsel) 6.0
11/29/2017	MD	0.4	call with client about position and potential testimony as trial witness 0.4
11/29/2017	JS	0.1	Email to Travel Agency approving itinerary
11/29/2017	ME	1	prepare counter deposition designations for production to opposing counsel .9; send 1 counter deposition designations to opposing counsel .1
11/29/2017	MM	0.9	Review and incorporate co-counsel's revisions and comments on jury instructions
11/29/2017	JS	0.1	Email to Travel Agency providing dates for travel for witnesses
11/29/2017	MS	1.5	tc w/ witness re happy camper declaration
11/29/2017	MM	0.2	MD/MS/MM: Discuss jury instructions
11/29/2017	JK	0.9	JK Create log of differences between the damage calculation payroll history and the updated version sent by Defendant on 11.17.17
11/29/2017	AG	0.3	Ordered Transcripts (Nov. 18 status conference)
11/29/2017	MD	0.2	MD/MS/MM: Discuss jury instructions
11/29/2017	MS	0.2	MD/MS/MM: Discuss jury instructions
11/29/2017	JS	0.4	Convert Defendant's Amended Exhibit List from PDF to Excel for ease of review and objection or stip
11/29/2017	MM	0.2	Email co-counsel about jury instructions and verdict form
11/29/2017	ME	0.2	MD/ME review opt-in's discovery documents to prepare for production to opposing counsel
11/29/2017	JK	2.5	JK Incorporate new Job history into to lookup table to work into the damage calculations. MD/ME review opt-in's discovery documents to prepare for production to opposing
11/29/2017	MD	0.2	counsel
11/29/2017	ME	1.2	compile exhibits for cross examination of witnesses at mock trial
11/30/2017	MA	0.3	MA/JF Review the task of outreaching witnesses to confirm their travel/testimony dates (trial preparation)
11/30/2017	JS	2.7	Run new index for entire Plt Exhibit List; copy links to tracking spreadsheet
11/30/2017	MS	0.8	md/ms confer with ET about pre-trial conference with court 0.8
11/30/2017	JS	0.3	Email travel form to additional putative witnesses
11/30/2017	MM	0.3	Email co-counsel about argument related to jury instructions
11/30/2017	MM	0.3	MD/MS/MM: debrief after call with local counsel to discuss next steps regarding jury instructions
11/30/2017	MS	0.5	MS/MM: discuss argument regarding jury instructions and trial strategy

Date	Staff	Amount of Time	Description
11/30/2017	MM	4.1	Research and analyze case law and model jury instructions (1.3); revise jury instructions (0.6); draft argument in support of proposed jury instructions (2.2)
11/30/2017	MD	0.7	md/ms participate in court conference telephonically 0.7
11/30/2017	MD	0.8	md/ms confer with ET about pre-trial conference with court 0.8
11/30/2017	MD	0.3	MD/MS/MM: debrief after call with local counsel to discuss next steps regarding jury instructions
11/30/2017	MS	0.8	MD/MS/MM: call local counsel regarding jury instructions, verdict form, and pretrial conference
11/30/2017	MD	0.8	MD/MS/MM: call local counsel regarding jury instructions, verdict form, and pretrial conference
11/30/2017	MS	0.7	md/ms participate in court conference telephonically 0.7
11/30/2017	MM	0.7	Create clean version of proposed compromise jury instructions to send to defense counsel before meet and confer
11/30/2017	MS	1.2	interview with client re MOTUS usage and data
11/30/2017	MM	0.3	Read and respond to email from MD about scheduling of witness interviews
11/30/2017	JF	0.3	MA/JF Review the task of outreaching witnesses to confirm their travel/testimony dates (trial preparation)
11/30/2017	MM	0.8	MD/MS/MM: call local counsel regarding jury instructions, verdict form, and pretrial conference
11/30/2017	JK	0.4	JK Create list of consent to sue dates for all Plaintiffs with damages.
11/30/2017	MM	0.2	MS/MM: check-in regarding jury instructions priorities
11/30/2017	MM	0.1	MM/JF Check-in re witness pre-trial witness interview scheduling logistics
11/30/2017	JK	2.7	JK Continue to work on new damage calculations reflecting the updated job history sent by Kellogg on 11.17.17.
11/30/2017	MS	0.2	MS/MM: check-in regarding jury instructions priorities
11/30/2017	JK	2.9	JK Compare new damages to old damages to determine if anyone who was dismissed from the case now has claims based on new 11.17.17 job history.
11/30/2017	MM	0.5	MS/MM: discuss argument regarding jury instructions and trial strategy
11/30/2017	MS	2.9	preparing client for trial testimony
11/30/2017	MM	0.3	Read and respond to co-counsel's emails regarding jury instructions
11/30/2017	MD	6	trail prep 6.
11/30/2017	JF	0.1	MM/JF Check-in re witness pre-trial witness interview scheduling logistics
11/30/2017	MA	0.1	call to witness to schedule testimony and prep call
11/30/2017	JK	0.2	JK/MD Discuss creation of list of consent to sue dates for all Plaintiffs with damages.
11/30/2017	MA	0.1	call to witness to schedule testimony and prep call
11/30/2017	MA	0.1	call to witness to schedule testimony and prep call
11/30/2017	JS	0.6	Generate revised amended exhibit list for filing
11/30/2017	MD	0.1	JK/MD Discuss preparation of technology for trial
11/30/2017	MD	0.2	JK/MD Discuss creation of list of consent to sue dates for all Plaintiffs with damages.
11/30/2017	MA	0.1	call to witness to schedule testimony and prep call
11/30/2017	MM	0.2	MM/JF Check-in re scheduling of witness interviews
11/30/2017	CLER	1	prepare mailing of document for clients review (trial material)
11/30/2017	MA	0.2	call to witness to schedule testimony and prep call
11/30/2017	JK	0.1	JK/MD Discuss preparation of technology for trial
11/30/2017	JK	0.1	JK/MD Discuss Rep Route Sales Plaintiffs into the trial damages.
11/30/2017	JS	0.2	Draft and send email to trial support company for estimate / quote on processing of exhibits

Date	Staff	Amount of Time	Description
			Transfer documents recd from ECF system to docket file and create file copy (Docket#496
11/30/2017	CLER	0.1	P. Proposed Pretrial Order)
11/30/2017	JF	0.3	MD/JF Check-in re witness preparation scheduling
			MD/MS/MM: debrief after call with local counsel to discuss next steps regarding jury
11/30/2017	MS	0.3	instructions
11/30/2017	JS	1.5	Reconcile numbering of exhibits after removing ~50
11/30/2017	MA	0.1	call to witness to schedule testimony and prep call
11/30/2017	JF	0.2	MM/JF Check-in re scheduling of witness interviews
			Correspondence with Travel Agent relating to individual witnesses flight itineraries and
11/30/2017	JS	0.7	hotel reservation confirmations
11/30/2017	MD	0.3	MD/JF Check-in re witness preparation scheduling
11/30/2017	MA	0.1	call to witness to schedule testimony and prep call
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	MM	1.3	Create clean copies of jury instructions for mock trial juries
12/1/2017	MD	0.2	MD/MM: check in regarding pre-trial witness interview
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	MS	11	travel Kingston to Tacoma
12/1/2017	JS	0.1	Copy ICAL itinerary to shared trial calendar with flight times and dates
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	MM	0.2	MD/MM: check in regarding pre-trial witness interview
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/1/2017	MS	3.1	revisions to mock trial opening statement
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	MM	2	Prepare for pret-trial witness interviews (1.0); read deposition (1.0)
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	MM	0.2	Email and print mock trial jury instructions and verdict form documents to MD and MS
			Identify and locate Defendant exhibits and hyperlink in index for ease of review and
12/1/2017	JS	4.6	production of copies
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
			JK Create a new set of damage calculations for the mediator based on the original
			FRE1006 damage calculations but have the individuals who did not respond to
12/1/2017	JK	2.7	interrogatories removed.
12/1/2017	MD	8	trail prep 8.0
			JK Incorporate into Plaintiffs fair settlement value changes to the damages based on the
12/1/2017	JK	2.3	removal of Plaintiffs. who did not respond to interrogatories removed.
12/1/2017	JS	0.1	Call re trial witness prep scheduling conflict
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	JS	0.1	Copy .ical itinerary to shared trial calendar with flight times and dates
12/1/2017	MM	0.5	Revise jury verdict form

Date	Staff	Amount of Time	Description
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for witnesses
12/1/2017	MM	0.2	MS/MM: Check in regarding expert outline
12/1/2017	MA	0.3	call from opt-in for information
12/1/2017	JK	0.4	JK Research and identify tools necessary to present electronic documents to prepare witnesses while on the road for trial.
12/1/2017	JS	0.2	Call to cancel prep call
12/1/2017	MA	0.2	call from opt-in for trial information
12/1/2017	JS	0.4	JS/MD/JK meet to discuss trial preparation, logistics, technical and technological issues
12/1/2017	ME	0.1	telephone call from trial witness with question about getting form to give to employer
12/1/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#497)
12/1/2017	CLER	0.1	D. PROPOSED ORDER (Unsigned) re [495] Notice)
12/1/2017	MS	0.2	MS/MM: Check in regarding expert outline
12/1/2017	MD	0.4	JS/MD/JK meet to discuss trial preparation, logistics, technical and technological issues
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for witnesses
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for witnesses
12/1/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#498)
12/1/2017	CLER	0.1	NOTICE OF FILING OF OFFICIAL TRANSCRIPT of Motion Hearing held on 11.9.2017)
12/1/2017	JK	0.4	JS/MD/JK meet to discuss trial preparation, logistics, technical and technological issues
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for witnesses
12/1/2017	MM	1.2	Prepare and review documents for pre-trial witness interview
12/1/2017	MM	1	Revise jury instructions (0.6); research jury instructions (0.4)
12/1/2017	JS	0.1	Review and approve / deny travel arrangements for trial witness
12/2/2017	MS	8	conduct mock trial
12/2/2017	MS	4.2	revisions to direct examinations for mock trial
12/2/2017	MM	1.6	Draft notes from pre-trial interview call with client
12/2/2017	MM	3.1	Call client for pre-trial interview and preparation.
12/3/2017	MS	8	conduct mock trial
12/3/2017	MS	3.5	MD/MS draft direct exam outline for plaintiffs based on mock trial results
12/3/2017	MD	3.5	MD/MS draft direct exam outline for plaintiffs based on mock trial results
12/3/2017	MM	2.8	Interview client via phone for pre-trial preparation
12/3/2017	MM	0.5	Review client file to prepare for pre-trial interview
12/3/2017	MM	0.5	Review, organize and complete notes from pre-trial interview
12/4/2017	JF	0.9	Correspond with witnesses to confirm travel plans
12/4/2017	JK	0.3	JK/MR discuss mobile hotspot considerations .2; discuss external 2nd monitor .1
12/4/2017	AD	0.1	AD/JF Discuss the issue of deceased plaintiffs, inclusion of their claims
12/4/2017	CM	0.5	prepare witness packet
12/4/2017	JF	0.2	Schedule witness for pre-trial attorney interview
12/4/2017	JS	0.1	Save travel itinerary to folder and email to team paralegal
12/4/2017	ME	0.2	cross check defendants' list of discovery non-responders from defendants' notice of lodging of amended proposed order
12/4/2017	JS	0.2	JS/ME discuss trial exhibit labeling and indexing project
12/4/2017	JF	0.3	ME/JF Discuss the issue of deceased plaintiffs, inclusion of their claims in the lawsuit
12/4/2017	JF	0.2	MM/JF Discuss the attorney pre-trial interviews/organizing logistics

Date	Staff	Amount of Time	Description
12/4/2017	MM	0.2	Email AG regarding notice of deposition of defense witness
12/4/2017	JS	0.1	Email to Andrea @ Travel Leaders, asking to correct itinerary; change dates.
12/4/2017	MM	2.4	Interview client telephonically in order to prepare for trial
12/4/2017	ME	0.2	JS/ME discuss trial exhibit labeling and indexing project
12/4/2017	JK	0.6	JK Check consent to sue date for 5 individuals where Defendant claims are off.
12/4/2017	JS	0.1	Approve travel itinerary via email
12/4/2017	JK	1.7	JK Format corrected damage calculations like the original FRE1006 exhibit produced for trial.
12/4/2017	JS	0.1	Save itinerary to folder, add flight itinerary to calendar, copy paralegals
12/4/2017	JS	0.1	Save revised itinerary in folder; add to calendar; forward to team
12/4/2017	ME	0.3	ME/JF Check-in re the status of the case, tasks
12/4/2017	AD	0.7	review results from focus group .7
12/4/2017	MM	0.5	Review, complete, and organize notes following telephonic pretrial interview.
12/4/2017	MR	0.8	Continue research on best solution for mobile hotspot for trial .6; Purchase mobile hotspot .1; Test external monitor for trial .1
12/4/2017	ME	0.9	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/4/2017	JS	0.1	Save itinerary information for trial witness to calendar and copy to folder
12/4/2017	JF	0.5	JS/JF Check-in re travel arrangements/scheduling
12/4/2017	MD	0.3	MD/JF De-brief/check-in re outstanding items re 1. trial tasks; 2. inclusion and order of witnesses; 3. excluded opt-ins
12/4/2017	MR	0.3	Examine report from mock trial .3
12/4/2017	JS	0.3	Correct exhibit with consent to sue dates; updated per Jason
12/4/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#499 MINUTE ENTRY for proceedings before Judge Leighton 12.1.2017)
12/4/2017	JS	0.5	Run test of Adobe PDF Portfolio to determine whether exhibits are parsable and comprehensible
12/4/2017	MM	3.2	Interview client via phone for trial preparation
12/4/2017	CLER	0.1	create PDF format of document recd from client (Acknowledgement/Agreement)
12/4/2017	ME	0.1	email case update to opt-in per request
12/4/2017	ME	0.1	email case update to opt-in per request
12/4/2017	JS	0.1	Approve travel itinerary for trial witness
12/4/2017	JF	0.3	ME/JF Check-in re the status of the case, tasks
12/4/2017	MR	0.3	JK/MR discuss mobile hotspot considerations .2; discuss external 2nd monitor .1
12/4/2017	JF	0.2	Research deceased opt-ins' inclusion on the excluded list
12/4/2017	JS	0.1	Save itinerary for flight and hotel to folder; email copy to calendar and Julia calendar
12/4/2017	ME	4.1	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/4/2017	JF	0.7	Update witness availability spreadsheet
12/4/2017	JF	0.1	AD/JF Discuss the issue of deceased plaintiffs, inclusion of their claims
12/4/2017	AD	0.1	AD/JF Discuss the status of opt-ins in bankruptcy
12/4/2017	JF	0.4	Reach out to witness re travel scheduling confirmation
12/4/2017	JS	5.1	Review all exhibits to ensure ocr, attached, xlsx to pdf, denote whether b/w or color for printers
12/4/2017	CM	0.1	CM/JF Discuss the task to assemble a witness packet
12/4/2017	JS	0.5	JS/JF Check-in re travel arrangements/scheduling
12/4/2017	MM	0.4	Email trial team regarding common questions from clients about trial logistics



Date	Staff	Amount of Time	Description
12/4/2017	JF	0.1	AD/JF Discuss the status of opt-ins in bankruptcy
12/4/2017	ME	0.3	review juror survey results from mock trial
12/4/2017	JF	0.1	CM/JF Discuss the task to assemble a witness packet
12/4/2017	JF	0.2	Draft email to potential witness
12/4/2017	ME	0.1	email case update to opt-in per request
12/4/2017	JF	0.3	MD/JF De-brief/check-in re outstanding items re 1. trial tasks; 2. inclusion and order of witnesses; 3. excluded opt-ins
12/4/2017	JS	0.2	Update exhibit with corrected CTS dates
12/4/2017	MD	10	trial prep 10.0
12/4/2017	JF	0.5	Draft email to selected witnesses to view safety videos
12/4/2017	CLER	0.1	create PDF format of document recd from client (Acknowledgement/Agreement)
12/4/2017	ME	0.3	ME/JF Discuss the issue of deceased plaintiffs, inclusion of their claims in the lawsuit
12/4/2017	MM	0.1	Email opposing counsel regarding deposition of defense expert witness.
12/4/2017	MS	2	revising plaintiff direct testimony outline based on mock trial results
12/4/2017	JS	0.1	Add trial witness travel dates to calendar
12/4/2017	AD	0.2	Review file for opt-in .2
12/4/2017	JS	0.1	Email approval for travel itinerary for trial witness
12/4/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#500 D. NOTICE OF LODGING OF AMENDED PROPOSED ORDER)
12/4/2017	MM	0.2	MM/JF Discuss the attorney pre-trial interviews/organizing logistics
12/4/2017	JK	1.1	JK Add column to the corrected damage calculations which indicates if the plaintiff is on the list of those who did not respond to their interrogatories.
12/4/2017	ME	0.2	prepare letter requested by opt-in for employer about trial attendance
12/4/2017	MM	0.2	Email opposing counsel regarding expert witness deposition
12/4/2017	MS	11	travel Tacoma to Kingston
12/4/2017	JK	0.6	JK Add "post production missing weeks" section to corrected damage calculations.
12/4/2017	AD	0.2	Call with counsel Henry Clark regarding bankruptcy amendment .2
12/4/2017	MM	0.4	Review client file in preparation for pre-trial interview
12/4/2017	MS	1.4	drafting important themes outline from mock trial materials
12/5/2017	MR	1.2	Fixed color laser printer for printing exhibits
12/5/2017	JF	0.2	ME/JF Check-in re various aspects of the trial preparations
12/5/2017	ME	1.4	MS/MM/AD/MD/JF/JS/ME provide mock trial debrief .3; determine logistics of final witness preparations .4; determine tasks still needed to complete for trial exhibits .4; decide time to present opening argument to staff for feedback .1; determine preparations needed once team arrives in Tacoma .2
12/5/2017	JF	0.7	Schedule top witnesses for attorney review (MS)
12/5/2017	MS	0.3	tc w/ ET re Speakman deposition and argument
12/5/2017	JS	0.2	EMail to Naegeli Trial Svcs re: printing and quote
12/5/2017	JF	0.8	Print/assemble/copy witness packets (for attorney review)
12/5/2017	MR	0.4	JS/MR discuss trial exhibits, strategy
12/5/2017	JF	0.2	MM/JF Review the witness interview process
12/5/2017	JS	0.1	JS/MR discuss remote access to work pc
12/5/2017	ME	0.2	print documents for witness' trial prep packet
12/5/2017	JS	0.4	JS/MR discuss trial exhibits, strategy
12/5/2017	ME	0.2	ME/JF Check-in re various aspects of the trial preparations
12/5/2017	MS	3.3	MS/MM: discuss legal arguments regarding jury instructions (2.0), discuss and revise direct examination of Plaintiffs (1.3)

Date	Staff	Amount of Time	Description
12/5/2017	MD	8	trial 8.
12/5/2017	MM	0.2	MM/JF Review the witness interview process
12/5/2017	AD	1.5	Draft Letter to deceased plaintiff family 1.5
12/5/2017	JS	0.2	Download Defendants' deposition counter-designations
12/5/2017	JS	0.1	JS/MR discuss remote access to work pc
12/5/2017	ME	1.3	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/5/2017	JS	0.4	Multiple attempts to call US Marshal's Office in Tacoma re: physical exhibits
12/5/2017	MM	0.9	Notice deposition of defense expert witness
12/5/2017	JF	0.2	MR/JF Walk-through re remote access to computer/email (trial preparation)
12/5/2017	JK	1.4	JK Create a summary page of changes to the extrapolations as a result of the last minute history data from Defendant.
12/5/2017	JS	1	Review Plt Trial Exhibits ensure OCR, denote whether need to print in color or b/w for printer.
12/5/2017	MR	0.1	JS/MR discuss remote access to work pc
12/5/2017	JF	0.4	AG/JF Help with production of witness packets (for attorney review/use)
12/5/2017	JS	0.4	Generate list for trial and house supplies; circulate to team.
12/5/2017	AG	0.2	arange court Reporter (deposition of Dr. Speakman)
12/5/2017	ME	0.1	print witness' itinerary for trial preparation
12/5/2017	CM	0.4	format spreadsheets for printing for witness prep
12/5/2017	JK	1.8	JK Organize the "rep route sales" position data in preparation for a meeting to determine if they were paid overtime.
12/5/2017	MM	0.2	Email proposed joint jury instructions to opposing counsel
12/5/2017	MM	1.4	MS/MM/AD/MD/JF/JS/ME provide mock trial debrief .3; determine logistics of final witness preparations .4; determine tasks still needed to complete for trial exhibits .4; decide time to present opening argument to staff for feedback .1; determine preparations needed once team arrives in Tacoma .2
12/5/2017	MM	0.8	Revise proposed joint jury instructions in preparation to send to defense counsel
12/5/2017	AD	1.4	MS/MM/AD/MD/JF/JS/ME provide mock trial debrief .3; determine logistics of final witness preparations .4; determine tasks still needed to complete for trial exhibits .4; decide time to present opening argument to staff for feedback .1; determine preparations needed once team arrives in Tacoma .2
12/5/2017	MD	1.4	MS/MM/AD/MD/JF/JS/ME provide mock trial debrief .3; determine logistics of final witness preparations .4; determine tasks still needed to complete for trial exhibits .4; decide time to present opening argument to staff for feedback .1; determine preparations needed once team arrives in Tacoma .2
12/5/2017	JS	0.2	Email to travel agent to reschedule two witnesses
12/5/2017	MS	1.4	MS/MM/AD/MD/JF/JS/ME provide mock trial debrief .3; determine logistics of final witness preparations .4; determine tasks still needed to complete for trial exhibits .4; decide time to present opening argument to staff for feedback .1; determine preparations needed once team arrives in Tacoma .2
12/5/2017	MS	0.6	MS/DG/MD discuss mock trial results and approaches to address issues
12/5/2017	JS	5.3	Continue review of all Plt exhibits; cataloguing, noting what formats to print for printer.
12/5/2017	MR	0.2	MR/JF Walk-through re remote access to computer/email (trial preparation)
12/5/2017	ME	0.6	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/5/2017	MD	0.6	MS/DG/MD discuss mock trial results and approaches to address issues
12/5/2017	DG	0.6	MS/DG/MD discuss mock trial results and approaches to address issues

Date	Staff	Amount of Time	Description
12/5/2017	MM	0.3	Amend deposition notice of defense expert witness (0.2), email deposition notice to defense counsel (0.1)
12/5/2017	AG	0.4	AG/JF Help with production of witness packets (for attorney review/use)
12/5/2017	JF	1.4	MS/MM/AD/MD/JF/JS/ME provide mock trial debrief .3; determine logistics of final witness preparations .4; determine tasks still needed to complete for trial exhibits .4; decide time to present opening argument to staff for feedback .1; determine preparations needed once team arrives in Tacoma .2
12/5/2017	MM	3.3	MS/MM: discuss legal arguments regarding jury instructions (2.0), discuss and revise direct examination of Plaintiffs (1.3)
12/5/2017	MR	0.4	Set up remote access and remote email for paras JS and JF .3; test access .1
12/5/2017	JS	1.4	MS/MM/AD/MD/JF/JS/ME provide mock trial debrief .3; determine logistics of final witness preparations .4; determine tasks still needed to complete for trial exhibits .4; decide time to present opening argument to staff for feedback .1; determine preparations needed once team arrives in Tacoma .2
12/5/2017	JF	0.7	MD/JF Meet to re-arrange testimony schedules for trial witnesses
12/5/2017	MS	0.2	MS/ME mock trial debrief
12/5/2017	ME	0.2	MS/ME mock trial debrief
12/5/2017	CM	0.1	call from opt-in re time to speak with paralegal on case
12/5/2017	AG	0.4	prepare trial packet of client for Sweeney
12/5/2017	ME	1.9	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/5/2017	MS	0.5	tc w/ ET re FWW briefing in trial brief
12/5/2017	MD	0.7	MD/JF Meet to re-arrange testimony schedules for trial witnesses
12/5/2017	ME	1.4	search defendants' motions regarding depositions to confirm they did not reserve depositions for trial witnesses that have not yet been deposed
12/5/2017	JS	0.2	EMail to Courtroom Deputy re: physical exhibits
12/5/2017	MS	3.2	witness interview
12/5/2017	JK	1.8	JK Incorporate data for any leave of absence weeks that occur during the extrapolation time period so they can be removed from the recovery value.
12/6/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#501 STATEMENT Defendants' Suggestions of Death of Opt-In Plaintiffs William Trout and Roger Lecocq)
12/6/2017	JF	0.1	Reach out to witness re trial availability/scheduling
12/6/2017	JS	0.3	Upload Safety Videos to Drive for ease of trial witness access for review prior to pre-trial interview
12/6/2017	JS	0.2	JS/ME discuss cleaning up exhibits
12/6/2017	JF	0.2	ME/JF Check-in re questions related to trial prep progress
12/6/2017	MS	3.5	Witness interview
12/6/2017	ME	0.1	email JS about trial exhibits to be printed
12/6/2017	JS	0.1	JS/MD discuss possible exhibit; content and formatting
12/6/2017	ME	0.2	JS/ME discuss cleaning up exhibits
12/6/2017	MD	0.1	JS/MD discuss possible exhibit; content and formatting
12/6/2017	ME	0.2	ME/JF Check-in re questions related to trial prep progress
12/6/2017	MM	0.2	MS/MM: Discuss general strategies for defense expert witness deposition
12/6/2017	MD	0.3	MD/JF Meet to discuss the order of witnesses
12/6/2017	MS	0.2	MS/MM: Discuss general strategies for defense expert witness deposition
12/6/2017	JS	0.1	Call US Marshals in Seattle (due to no answer at Tacoma); leave voicemail for call back.
12/6/2017	JK	2.4	JK Create new Hourly rates spreadsheet for trial
12/6/2017	JF	0.3	MD/JF Meet to discuss the order of witnesses

Date	Staff	Amount of Time	Description
12/6/2017	JS	0.7	Set up LYFT for Business account for litigation team and trial witness travel
12/6/2017	JK	0.6	JK Create new payroll summary spreadsheet for trial.
12/6/2017	JF	0.5	Check/review email (remote access)
12/6/2017	ME	2.9	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/6/2017	JS	0.7	Reconcile current in-house exhibit list with prior lists sent to defendant; update; email link to MD to send to Defendant.
12/6/2017	JF	0.7	Outreach to witnesses re scheduling of follow-up witness prep attorney-led interviews
12/6/2017	MS	5.2	revising opening statement based on mock trial feedback
12/6/2017	MM	0.8	Review defense expert report in preparation for deposition
12/6/2017	MS	0.3	MD/MS tc w/ mediator Smith
12/6/2017	JS	0.2	Finalize exhibit with CTS dates for plaintiffs, email to attorney to send to Defendants
12/6/2017	JS	4.8	Review and mark Plt trial exhibits; note whether color or b/w for printing service
12/6/2017	JS	0.2	Troubleshoot safety video linking
12/6/2017	MD	0.3	MD/MS tc w/ mediator Smith
12/6/2017	MM	0.8	Review and organize notes from pre-trial preparation call
12/6/2017	MD	8	trial prep 8
12/6/2017	JK	1.1	JK Review damage calculations before handing them off to be produced.
12/6/2017	JK	1.9	JK Recalculate bonus spread for updated trial damages.
12/6/2017	JK	1.9	JK Recalculate prize spread for updated trial damages.
12/6/2017	MS	0.5	review revised KASA video produced by Kellogg
12/6/2017	JK	1.1	JK Remove data from trial damage calculations that does not fall within the statute of limitations.
12/6/2017	ME	1.6	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/6/2017	MM	2.9	Interview client telephonically for pre-trial preparation
12/6/2017	MS	1	reviewing Speakman reports in preparation for his deposition
12/6/2017	JF	3.2	Evaluate/re-assign the order of witnesses/witness testimony (trial preparation)
12/6/2017	MS	1.5	Annotating Speakman MOTUS report and outline deposition exam
12/6/2017	MM	0.7	Organize and compile notes from pre-trial preparation call
12/6/2017	JK	1.9	JK Recalculate commission spread for updated trial damages.
12/6/2017	MD	0.7	JK/MD Review final tweaks to revised trial damages before they get produced
12/6/2017	MM	3.4	Interview client telephonically for pre-trial preparation
12/6/2017	JF	0.2	MD/JF Check-in re trial preparations, review of tasks/priorities
12/6/2017	JK	0.7	JK/MD Review final tweaks to revised trial damages before they get produced
12/6/2017	MD	0.2	MD/JF Check-in re trial preparations, review of tasks/priorities
12/7/2017	MS	0.1	MS/MM: Discuss opening statement
12/7/2017	JS	0.6	Create exhibit explaining TM/TSR work hours
12/7/2017	MS	0.3	email correspondence with witness re MOTUS
12/7/2017	JS	1.9	Approve various travel requests and itineraries; save to file
12/7/2017	MS	0.1	MR/MS discuss MOTUS data review
12/7/2017	AG	0.5	Conduct search of contact information (surviving family members of Rodger Lecocq and William Trout)
12/7/2017	JF	3.8	Update master witness spreadsheet with relevant data
12/7/2017	MS	0.4	revise opening based on listener comment
12/7/2017	JS	0.5	Approve various travel itineraries, save to travel tracking folder

Date	Staff	Amount of Time	Description
12/7/2017	JS	2.6	Format Exhibits for printer, rename files, compress and send via FTP
12/7/2017	JS	0.2	Call with trial support company re: exhibits and timeline
12/7/2017	MM	0.1	MS/MM: Discuss opening statement
12/7/2017	JS	0.2	Download Defendant Production of updated wage records; email to Analytics
12/7/2017	JF	3.8	Witness outreach for attorney led preparations/attorney scheduling
12/7/2017	ME	0.2	telephone call from opt-in for case update
12/7/2017	MM	1.2	Review, compile and organize notes from client interview
12/7/2017	MS	0.2	review MR comments on MOTUS data review
12/7/2017	MR	0.1	MR/MS discuss MOTUS data review
12/7/2017	MM	0.3	MD/MM: debrief regarding client interview
12/7/2017	MS	0.2	arrange tech coordination for Speakman depo
12/7/2017	MM	0.6	Arrange travel to trial
12/7/2017	MS	0.3	Memo to team on witness information re MOTUS
12/7/2017	MS	0.4	review and revise TM/TSR demonstrative exhibit
12/7/2017	JK	1.3	JK Review new TM data that was produced by Defendant today.
12/7/2017	JK	2.4	JK Recreate graph of comparison between TM and RSR rates.
12/7/2017	JS	0.2	Send Travel forms to attorney with explanation of how to complete and submit
12/7/2017	MD	0.8	JK/MD Review finalize damage calculations before production
12/7/2017	MM	0.5	Review client files to prepare for trial preparation interviews
12/7/2017	JK	1.7	JK Double check all damage calculation spread values for accuracy.
12/7/2017	MR	0.8	Review past notes on Motus .5; compose/email detailed comments about Motus to MS .3
12/7/2017	MS	1.1	Interview witness re MOTUS practice and functionality
12/7/2017	JK	1.9	JK/MD Prepare for tomorrows Deposition
12/7/2017	ME	0.2	print color copies of documents for witnesses' trial prep packets
12/7/2017	ME	0.4	search for document requested by attorneys for trial preparation
12/7/2017	MM	3.8	Interview client telephonically to prepare for trial
12/7/2017	MS	0.2	email to ET re exhibit admissibility
12/7/2017	MD	10	trial prep 10.0
12/7/2017	ME	1	MS/ME listen to MS opening statement and provide feedback
12/7/2017	ME	2.8	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/7/2017	MS	1	developing deposition topics for Speakman testimony
12/7/2017	MS	2	develop direct examination of plaintiffs for MOTUS issues
12/7/2017	JK	0.8	JK/MD Review finalize damage calculations before production
12/7/2017	MS	1	MS/ME listen to MS opening statement and provide feedback
12/7/2017	MS	0.4	register for travel services and request flight for Tacoma
12/7/2017	JS	0.7	Reformat photos of physical exhibits, resize and resample, covert to pdf
12/7/2017	MD	0.3	MD/MM: debrief regarding client interview
12/7/2017	JS	0.8	Update FRE 1006 Exhibits. reformat.
12/7/2017	MS	1	interview with potential witness re MF work
12/7/2017	AG	0.2	prepare Letter to Families (notification to contact)
12/7/2017	MS	0.4	interview with potential witness re MF work
12/7/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#502 AMENDED ORDER re [500] Dismissing Claims of 34 Non-Responding Plaintiffs)
12/7/2017	AG	0.2	prepare Letter to Families (notification to contact)
12/8/2017	JF	2.8	Outreach of witnesses to schedule flights/accommodations/pre-trial attorney interviews

Date	Staff	Amount of Time	Description
12/8/2017	JF	0.4	MS/JF Review the importance of hours worked in MF pre- and post-Acosta re-structure
12/8/2017	JK	1.1	JK Watch practice of opening statement
12/8/2017	JS	0.1	Reformat files for presentation of opening argument
12/8/2017	DG	1.7	listen to oral argument run through and give comments 1.7
12/8/2017	CM	0.7	prepare copies of witness packets for attorneys for witness preparation
12/8/2017	MR	0.6	Check credit card balance due to flight costs causing credit line overage .3; Pay down credit balance to allow all flight costs to be covered .3
12/8/2017	MS	0.4	MS/JF Review the importance of hours worked in MF pre- and post-Acosta re-structure
12/8/2017	JK	1.4	JK final review before being deposed.
12/8/2017	JF	1.5	Listen/offer feedback to MS re opening statement (trial preparation)
12/8/2017	CM	0.5	prepare copy of witness packet for attorney for witness preparation call
12/8/2017	JS	1.1	Rename all Plt Exhibit files to reflect court numbering preference
12/8/2017	MM	0.2	Email to JF regarding pretrial interview scheduling
12/8/2017	JK	3.1	JK Deposition of Jason Kandel regarding FRE1006 exhibits.
12/8/2017	MM	0.5	Observe and critique MS opening statement
12/8/2017	MM	0.3	MD/MM: debrief regarding client interviews
12/8/2017	MD	8	trial prep 8.
12/8/2017	MM	3	Call client for interview and trial preparation
12/8/2017	MM	2	Call client for pretrial interview
12/8/2017	ME	1	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/8/2017	ME	0.2	MD/ME discuss implications of mediations recommendation letter
12/8/2017	AG	1.5	Kellogg opening statement review
12/8/2017	ME	1.6	listen to MS opening statement and provide feedback
12/8/2017	MM	0.3	Review mediator's recommendation
12/8/2017	MA	1	listen to/critique opening statements
12/8/2017	MD	0.4	MD/JF Meet re the order/ranking of witnesses
12/8/2017	JF	0.4	MD/JF Meet re the order/ranking of witnesses
12/8/2017	JS	0.5	Troubleshoot billing issues for travel billing for plaintiffs and firm
12/8/2017	MM	0.2	Email to MS regarding defense expert witness deposition
12/8/2017	MR	1.5	feedback session on trial opening statement
12/8/2017	MM	0.3	Email travel agent regarding travel for trial
12/8/2017	ME	0.3	conduct research of documents to indicate the foundation of trial exhibits to assist attorneys with trial preparation
12/8/2017	MM	0.5	Review defense expert witness report in preparation for deposition
12/8/2017	MM	2.5	MS (part)/MM: Client interview to prepare for trial
12/8/2017	CLER	0.1	create PDF format of document recd from client (acknowledgment/agreement)
12/8/2017	JF	3.9	Review/update master spreadsheet with relevant flight information and testimony ranking/order
12/8/2017	JF	1.4	Print/assemble witness packet for attorneys to review in the course of witness interviews
12/8/2017	MS	3.3	preparing opening statement presentation to firm
12/8/2017	CM	1.5	feedback session on trial opening statement
12/8/2017	MS	0.3	review and circulate Kellogg motion to exclude witnesses
12/8/2017	MS	0.7	MS (part)/MM: Client interview to prepare for trial
12/8/2017	MS	3	interview with testifying plaintiff
12/8/2017	AD	1.5	Run through of opening statement 1.5



Date	Staff	Amount of Time	Description
			Communications with trial support company re: additional items needed, costs, and
12/8/2017	JS	0.8	timeline
12/8/2017	MD	0.2	MD/ME discuss implications of mediations recommendation letter
12/8/2017	MS	1	review exhibits for trial
12/9/2017	CLER	0.1	create PDF format of document recd from client (acknowledgment/agreement)
12/9/2017	MS	1	conf call w Plaintiffs re settlement
			Read defendants' most recent filing (0.3), and email correspondence between MS and ET
12/9/2017	MM	0.5	related thereto (0.2)
12/9/2017	MS	1.2	interview with trial witness re MOTUS records and habits
12/9/2017	MS	1.3	individual calls with 5 plaintiffs re mediator proposal approval
12/9/2017	MS	2.2	developing direct exam of Lisha Pennington
12/10/2017	MS	3.1	developing direct exam of Lisha Pennington continued
12/10/2017	MM	0.3	Review client file in prepeparation for interview
12/10/2017	MS	2.3	draft response to Kellogg request to exclude witnesses
12/10/2017	MS	1.1	review and revise trial brief
12/10/2017	MM	2.2	Call client for pre-trial preparation interview
12/10/2017	MM	0.3	Email defense counsel to schedule meet & confer regarding jury instructions
12/11/2017	MS	0.3	revise response to Kellogg's motion to exclude witnesses
			format plaintiffs' response to defendants' objection to plaintiffs' second amended
12/11/2017	ME	0.7	witness list and request to preclude plaintiffs from calling undeposed opt-in's
12/11/2017	MS	0.7	draft FWW jury instruction and verdict form
12/11/2017	MS	0.2	arrange formatting of response to Kellogg's motion to exclude witnesses for filing
12/11/2017	MS	0.4	review ET additional comments to trial brief and incorporate
12/11/2017	AD	0.4	Call with client .4
			conduct research of documents to indicate the foundation of trial exhibits to assist
12/11/2017	ME	1	attorneys with trial preparation
12/11/2017	MS	0.4	revise trial brief to include additional facts
12/11/2017	MS	1.2	MS/MM: Discuss defense expert deposition questions
12/11/2017	MM	0.2	Review client file to prepare for pretrial interview
12/11/2017	AG	0.2	preapre PHV application (M.Rafferty)
			Return client call regarding questions about trial she thought of after pretrial interview
12/11/2017	MM	0.2	call
			ECF Filing of P. RESPONSE to D. re [504] Objections to Plaintiffs Second Amended Witness
12/11/2017	AG	0.2	List and Request to Preclude Plaintiffs from Calling Undeposed Opt-Ins
12/11/2017	CLER	0.1	create PDF format of document recd from client (Acknowledgement/Agreement)
12/11/2017	JS	0.1	Save itinerary for plt to file; add to shared calendar
12/11/2017	ME	0.2	read mediator's recommendation letter
12/11/2017	MA	0.2	JS/MA meet to review organization strategies for trial exhibits
12/11/2017	ME	0.1	MD/ME discuss mediator's recommendation
12/11/2017	JS	0.2	Revise travel plan and itinerary for plaintiff; send information to Travel agent for update
			conduct research of documents to indicate the foundation of trial exhibits to assist
12/11/2017	ME	0.4	attorneys with trial preparation
12/11/2017	JS	0.1	Revise travel plan and itinerary for plaintiff; send information to Travel agent for update
12/11/2017	MS	2.4	prepare client for testimony

Date	Staff	Amount of Time	Description
12/11/2017	MM	0.3	Organize notes from pretrial interview
			JK Recreate comparison of hourly rates between TMs and RSRs incorporating new data
12/11/2017	JK	1.9	sent by Defendant.
12/11/2017	MD	0.1	MD/ME discuss mediator's recommendation
12/11/2017	MM	0.5	Outline questions for defense expert deposition
12/11/2017	JS	0.1	Revise travel plan and itinerary for plaintiff; send information to Travel agent for update
12/11/2017	JS	0.6	Book flight for second trial period
12/11/2017	MD	10	trial prep 10
			conduct research of documents to indicate the foundation of trial exhibits to assist
12/11/2017	ME	1.5	attorneys with trial preparation
12/11/2017	MM	0.7	Organize notes from client pretrial preparation interview
12/11/2017	JF	11	Prepare for trial proceedings/witness outreach
12/11/2017	ME	0.1	JS/ME review status of exhibit list labeling for foundation
12/11/2017	JS	0.1	JS/ME review status of exhibit list labeling for foundation
12/11/2017	MM	1.2	MS/MM: Discuss defense expert deposition questions
12/11/2017	MM	0.2	Revise fluctuating work week jury instruction
			Read/reply multiple times to email exchange regarding MS' examination of expert's
12/11/2017	MR	1.2	Motus data .5; Examine expert's new Motus data .7
12/11/2017	MM	0.1	MD/MM: Debrief regarding client interview
12/11/2017	JS	0.2	Revise travel plan and itinerary for plaintiff; send information to Travel agent for update
			Transfer documents recd from ECF system to docket file and create file copy (Docket#504
12/11/2017	CLER	0.1	- D. OBJECTIONS to Plaintiffs' Second Amended Witness List)
12/11/2017	JS	0.2	Update file for FRE 1006 exhibit
12/11/2017	MM	0.4	Organize notes after pretrial preparation call
12/11/2017	JS	0.2	JS/MA meet to review organization strategies for trial exhibits
			Transfer documents recd from ECF system to docket file and create file copy (Docket#503
12/11/2017	CLER	0.1	D. Stipulated MOTION for Variance from Local Rule 83.1(d)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#505
			P. RESPONSE to D. re [504] Objections to Plaintiffs Second Amended Witness List and
12/11/2017	CLER	0.1	Request to Preclude Plaintiffs from Calling Undeposed Opt-Ins)
12/11/2017	MM	4	Call client for pretrial preparation interview
			Email to trial support with clarification of needs, further questions about formatting and
12/11/2017	JS	0.2	printing
12/11/2017	MM	0.5	Outline questions for defense expert witness deposition
12/11/2017	MD	0.1	MD/MM: Debrief regarding client interview
12/12/2017	MM	2.7	Call client for pretrial preparation interview
			Transfer documents recd from ECF system to docket file and create file copy (Docket#511
12/12/2017	CLER	0.1	P. APPLICATION OF ATTORNEY Meagan Rafferty FOR LEAVE TO APPEAR PHV)
12/12/2017	JS	0.1	Schedule travel for staff
			Continue examining prior Motus work .3; Email notes to atty MS about prior Motus work
			.1; Examine Whitaker's testimony on Kellogg's use of Motus .1; Email excerpt of
12/12/2017	MR	0.6	Whitaker's deposition to atty MS .1
12/12/2017	CLER	0.2	prepare mailing packet to client (review trial material)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#510
12/12/2017	CLER	0.1	D. APPLICATION OF ATTORNEY Michelle L. DuCharme FOR LEAVE TO APPEAR PHV)

Date	Staff	Amount of Time	Description
12/12/2017	JS	0.7	Revise opening statement exhibits for MS, send link for review
			conduct research of documents to indicate the foundation of trial exhibits to assist
12/12/2017	ME	0.7	attorneys with trial preparation
12/12/2017	MM	0.2	Email MS regarding defense expert deposition
			Transfer documents recd from ECF system to docket file and create file copy (Docket#512
12/12/2017	CLER	0.1	ORDER [509] Application for Leave to Appear PHV Fordyce)
12/12/2017	CM	1.1	prepare witness packets
12/12/2017	CLER	0.1	file hard copies of deposition exhibits in electronic case folder
12/12/2017	MM	0.2	MD/MM: discuss deposition designations
12/12/2017	ME	0.1	update links to documents that should be included in amended exhibit list
12/12/2017	ME	0.1	MD/ME discuss updates needed for trial exhibit list
			note discrepancies between exhibits on trial exhibit list and those used in depositions so
12/12/2017	ME	0.5	the trial exhibit list can be amended
12/12/2017	MS	1.1	drafting FWW jury instruction and verdict question for trial brief
			conduct research of documents to indicate the foundation of trial exhibits to assist
12/12/2017	ME	0.7	attorneys with trial preparation
			Transfer documents recd from ECF system to docket file and create file copy (Docket#506
12/12/2017	CLER	0.1	ORDER granting [503] Stipulated Motion for Variance from Local Civil Rule 83.1(D)
12/12/2017	MD	10	trial prep 10.
12/12/2017	JS	0.2	Save itinerary and flight times to calendar.
12/12/2017	MS	4.5	review and revise direct exam of Dr Speakman on MOTUS report
12/12/2017	CLER	0.1	create PDF format of document recd from client (acknowledgment/agreement)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#507
12/12/2017	CLER	0.1	D Response to Motion to Strike Rebuttal Report 491
12/12/2017	JS	0.1	Email JF re: possibility of changing flight for trial witness per her request
12/12/2017	ME	0.9	prepare trial witness preparation packet
12/12/2017	MS	3.7	review and analyze Speakman MOTUS data base and analysis
12/12/2017	MM	0.5	Review opposing counsel's revisions and proposed changes to jury instructions
12/12/2017	JS	0.6	Compare labor studies (2006, 2008, 2010) to ensure they are all substantively identical.
12/12/2017	AG	0.3	Prepare subpoena for trail for client .20 emailed subpoena to client .10
12/12/2017	ME	1.2	work on formatting trial brief to be filed tomorrow
			put together example of witness testifying to hours worked in deposition to assist
12/12/2017	ME	0.2	attorneys with trial preparation
12/12/2017	JS	0.4	Call with WAWD Court re: Exhibits
12/12/2017	JS	0.2	Schedule travel for witness
12/12/2017	JS	0.1	Send request to book flight and hotel
12/12/2017	JS	0.2	Schedule travel for witness
			Check credit card balance again with regard to flight costs .2; Pay down credit balance
12/12/2017	MR	0.5	2nd time to allow all flight costs to be covered .3
12/12/2017	MM	2	Draft outline of questions for defense expert deposition
12/12/2017	JS	0.2	Schedule flight and hotel for trial witness
12/12/2017	AD	1.5	Draft Dismissal letter 1.5
12/12/2017	JK	1.4	JK Set up for Speakman Deposition
12/12/2017	JS	0.1	Schedule flight and hotel for trial witness
			Transfer documents recd from ECF system to docket file and create file copy (Docket#509
12/12/2017	CLER	0.1	D. APPLICATION OF ATTORNEY Tiffany S. Fordyce FOR LEAVE TO APPEAR PHV)
12/12/2017	JK	1.4	JK Prepare laptops for trial

Date	Staff	Amount of Time	Description
12/12/2017	JS	0.2	Schedule flight and hotel for trial witness
12/12/2017	MS	1	MD/MS/MM: Call with opposing counsel regarding jury instructions
			JK Update FRE1006 Plaintiffs payroll to remove 1 claimant who did not respond to
12/12/2017	JK	0.4	interrogatories.
12/12/2017	MM	2.5	Draft outline of questions for defense expert deposition
			JK Update FRE1006 Hourly Rates to remove 1 claimant who did not respond to
12/12/2017	JK	0.4	interrogatories.
			JK Create a spreadsheet that can compare the gross pay averages for individual claimants
12/12/2017	JK	1.8	for different job titles.
12/12/2017	AD	1.2	Draft Motion to substitute party 1.2
12/12/2017	MM	0.6	MS/MM: Discuss jury instructions
			Revise two sets of exhibits; combine files, convert to pdf, create placeholder files, save
			copies to all four folders (binders, printer, court, in-house), zip file, send to printer with
12/12/2017	JS	1.1	explanation
12/12/2017	MD	0.2	MD/MM: discuss deposition designations
12/12/2017	MD	0.1	MD/ME discuss updates needed for trial exhibit list
12/12/2017	JS	0.5	Revise powerpoint exhibit and send link to attorney
			Research into .dta files (as produced 12-6 as part of Expert files) .3; Research into .dta
			converter to csv .3; Install demo converter; Convert 1st .dta file .1; Examine converted file
			.2; Email converted excel file to atty MS with comments .1; Convert 2nd .dta file .1;
12/12/2017	MR	1.4	Examine 2nd converter file .2; Email 2nd converted file to atty MS with comments .1
12/12/2017	MD	1	MD/MS/MM: Call with opposing counsel regarding jury instructions
			JK Update FRE1006 Hourly Rates to remove 1 claimant who did not respond to
12/12/2017	JK	0.4	interrogatories.
			conduct research of documents to indicate the foundation of trial exhibits to assist
12/12/2017	ME	0.8	attorneys with trial preparation
			Transfer documents recd from ECF system to docket file and create file copy (Docket#508
12/12/2017	CLER	0.1	D. REPLY to [505] Response)
12/12/2017	MS	0.6	MS/MM: Discuss jury instructions
12/12/2017	MM	1	MD/MS/MM: call with opposing counsel regarding jury instructions
12/12/2017	AD	0.4	Edit Motion to substitute party .4
12/12/2017	JF	9.2	Prepare for trial proceedings, witness outreach
12/12/2017	ME	0.1	telephone call from trial witness about trial dates
12/12/2017	ME	0.3	scan hard copies of deposition exhibits
12/12/2017	AD	0.3	Edit dismissal letter .3
12/12/2017	CLER	0.2	prepare mailing packet to client (review trial material)
12/12/2017	CLER	0.2	prepare fedex mailing to D. (Dr. Robert B. Speakman check)
12/12/2017	JK	0.4	JK Update trial damages to remove 1 claimant who did not respond to interrogatories.
12/13/2017	MM	6.5	Revise and complete joint jury instructions and joint statement of disputed instructions
12/13/2017	JS	0.1	Save travel itinerary and add dates to calendar
12/13/2017	MS	1.1	review and revise disputed jury instructions
12/13/2017	JS	0.4	MD/JS meet to discuss status of case, exhibits, next steps
12/13/2017	MM	2	Call client for pretrial preparation interview
12/13/2017	MS	0.9	draft various argument sections for disputed jury instructions
12/13/2017	CM	0.8	prepare package of trial materials for shipping
12/13/2017	JS	0.1	Approve travel plan to travel agency

Date	Staff	Amount of Time	Description
12/13/2017	MR	0.8	Examine case documents for info on Motus autopopulate feature .3; Examine depositions for info on Motus autopopulate feature.4; Email info to atty MS .1
12/13/2017	AN	0.2	Prepare cover letter with copy of subpoena to mail to Plaintiff 1 by US Postal Mail
12/13/2017	MS	3.1	review, revise and negotiate joint jury instructions with opposing counsel
12/13/2017	AN	0.4	Alphabetize witness packets for trial
12/13/2017	MA	1.4	proofread trial brief
12/13/2017	JF	8.5	Prepare for trial proceedings, witness outreach
12/13/2017	MS	0.3	tc w/ J Smith re Kellogg offer
12/13/2017	MM	4.5	Compile joint jury instructions for opposing counsel to review (2.0); draft objections to defendant's proposed instructions (2.5)
12/13/2017	MR	0.1	MS/JK/MR Discuss home/start aspect of Motus records .1
12/13/2017	ME	0.3	prepare exhibits for motion for party substitution
12/13/2017	AD	0.7	Draft proposed order .7
12/13/2017	AN	0.1	AD/AN Review source of blank AO-88 form for subpoena to appear and testify at a hearing or trial in a civil action
12/13/2017	AN	0.1	AG/AN Telephone conversation about best method of mailing large box of trial props to arrive within next two days
12/13/2017	JS	1.2	Prepare Exhibits for upload to FTP in order to provide to Defendants (ensure ordered and titled correctly and accurately, compress files); Send via FTP
12/13/2017	ME	0.6	make note of any electronic deposition exhibits used during defendant depositions to assist attorneys with trial prep
12/13/2017	JS	0.2	Book travel for trial witness
12/13/2017	MS	1.3	review and revise direct exam of Dr Speakman on initial report
12/13/2017	AN	0.2	Prepare Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action for plaintiff
12/13/2017	JS	0.1	2 Save travel itinerary to folder, add dates and times to calendar
12/13/2017	MR	1.8	Work with Verizon tech support on trying to fix problems with Hotspot
12/13/2017	ME	0.3	verify the accuracy of documents indicated as the foundation of trial exhibits to assist attorneys with trial preparation
12/13/2017	AG	0.1	AG/AN Telephone conversation about best method of mailing large box of trial props to arrive within next two days
12/13/2017	JS	0.1	Save list of witnesses who have not sent in travel forms
12/13/2017	MD	14	trial prep
12/13/2017	AN	0.1	Compose email to Plaintiff 1 with copy of Subpoena attached
12/13/2017	ME	2.1	compile all defendant deposition and trial exhibits to assist attorneys with trial preparation
12/13/2017	MS	1	review and revise direct exam of Dr Speakman on MOTUS report
12/13/2017	JS	0.2	Book travel for trial witness
12/13/2017	CM	0.2	JS/CM discuss best way to ship physical exhibits to trial location
12/13/2017	JS	0.1	Prepare physical exhibit package for shipment (cut box to size)
12/13/2017	JS	0.1	Approve travel plan to travel agency
12/13/2017	MS	1.1	review, revise and circulate neutral statement of facts for filing
12/13/2017	JS	0.2	Save flight and hotel itinerary, copy dates to calendar
12/13/2017	CM	0.2	find tracking number on fed ex to def for MS
12/13/2017	MS	4	conduct Speakman depo
12/13/2017	JS	0.1	Approve travel itinerary and send to agency
12/13/2017	AN	0.1	Compose email to Plaintiff 2 with copy of Subpoena attached
12/13/2017	MD	8	trial prep

Date	Staff	Amount of Time	Description
12/13/2017	AN	0.2	Prepare cover letter with copy of subpoena to mail to Plaintiff 2 by US Postal Mail
12/13/2017	MS	2.2	review and revise trial brief
12/13/2017	JS	0.2	Book flight and hotel for trial witness
			Prepare Subpoena to Appear and Testify at a Hearing or Trial in a Civil Action for plaintiff
12/13/2017	AN	0.2	1
12/13/2017	JS	0.2	Email to HHR re: taking possession of house and related logistical planning
12/13/2017	ME	0.1	MD/ME review exhibits needed for filing of motion for substitution of party
12/13/2017	ME	1.4	finish formatting trial brief 1.3; prepare exhibits for trial brief .1
12/13/2017	MS	0.1	MS/JK/MR Discuss home/start aspect of Motus records .1
			AD/AN Review source of blank AO-88 form for subpoena to appear and testify at a
12/13/2017	AD	0.1	hearing or trial in a civil action
12/13/2017	MD	0.4	MD/JS meet to discuss status of case, exhibits, next steps
12/13/2017	JK	0.1	MS/JK/MR Discuss home/start aspect of Motus records .1
12/13/2017	MD	0.1	MD/ME review exhibits needed for filing of motion for substitution of party
12/13/2017	JS	0.2	JS/CM discuss best way to ship physical exhibits to trial location
12/13/2017	JS	0.2	Book travel for trial witness
			ECF Filing of REPLY TO RESPONSE to [491] MOTION to Strike Defendants' Rebuttal Expert
12/14/2017	AG	0.1	Report
			Transfer documents recd from ECF system to docket file and create file copy (Docket#524
12/14/2017	CLER	0.1	EXHIBIT B re [523] MOTION to Substitute PARTY PURSUANT TO FED. R.CIV. P. 25(A)
12/14/2017	MM	0.3	Review client correspondence
			ECF Filing of EXHIBIT B re [523] MOTION to Substitute PARTY PURSUANT TO FED. R.CIV. P.
12/14/2017	AG	0.1	25(A)
12/14/2017	MS	0.9	evaluate Kellogg offers and positions in relation to rational settlement figures
			Transfer documents recd from ECF system to docket file and create file copy (Docket#522
12/14/2017	CLER	0.1	- REPLY TO RESPONSE to [491] MOTION to Strike Defendants' Rebuttal Expert Report
12/14/2017	MS	0.4	email conversation with ET re jury instructions
12/14/2017	AG	0.5	ECF Filing of NOTICE OF PLAINTIFFS DEPOSITION DESIGNATIONS
12/14/2017	MS	0.2	email w/ ET re Kellogg motions to exclude evidence
12/14/2017	JS	0.3	JS/JK meet to discuss travel plan, technology issues
			Package copies of deposition designations, zip, send to Naegeli for printing per Judge
12/14/2017	JS	0.6	Leighton's request.
			Work on problem in sync of files server case production text files .9, Return files server to
12/14/2017	MR	1.1	online mode .1; Send email to JK about problems with files server sync .1
12/14/2017	MM	0.2	Edit email to testifying plaintiffs
12/14/2017	JS	0.1	Email to Travel Leaders re: holding off on scheduling witness--dates may change
			Transfer documents recd from ECF system to docket file and create file copy (Docket#515
12/14/2017	CLER	0.1	Ds' Trial Brief)
			review trial exhibits to label who each exhibit relates to for internal use by attorneys
12/14/2017	ME	0.9	during trial
			Transfer documents recd from ECF system to docket file and create file copy (Docket#514
12/14/2017	CLER	0.1	ORDER on the [511] Application for Leave to Appear PHV Rafferty)
			Troubleshoot issues with unpacking compressed file provided by Defendants containing
12/14/2017	JS	0.6	trial exhibits



Date	Staff	Amount of Time	Description
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#521 Joint Statement of Disputed Instructions and Disputed Verdict Forms)
12/14/2017	MR	0.1	Read/send multiple replies to email exchange about getting payment to Tacoma printer
12/14/2017	ME	0.6	format motion to strike rebuttal report
12/14/2017	JK	0.3	JS/JK meet to discuss travel plan, technology issues
12/14/2017	CLER	0.1	prepare mailing of Subpoena to client
12/14/2017	JS	0.2	Download and save trial support invoice, email team about logistics of payment and delivery
12/14/2017	JK	0.6	JK Copy all case files to laptop 4
12/14/2017	JK	0.6	JK Copy all case files to laptop 2
12/14/2017	JK	0.6	JK Copy all case files to laptop 3
12/14/2017	JK	0.6	JK Copy all case files to laptop 2
12/14/2017	JS	0.1	Approve travel plan
12/14/2017	JF	6.2	Prepare for trial proceedings, witness outreach
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#516 Ds' Proposed Voir Dire)
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (NOTICE of Docket Text Modification re [523] MOTION to Substitute)
12/14/2017	JK	2.7	JK Prepare Other It things for trial.
12/14/2017	JS	0.4	Convert slides to pdf, highlight or otherwise modify; convert to jpg; add to powerpoint
12/14/2017	MD	10	trial prep 10.0
12/14/2017	ME	0.7	review trial exhibits to label who each exhibit relates to for internal use by attorneys during trial
12/14/2017	JS	0.3	Download Defendants' Trial Exhibits via FTP
12/14/2017	JK	0.6	JK Copy all case files to laptop 1
12/14/2017	MS	1.8	review Kellogg motion to exclude FRE exhibits and outline response
12/14/2017	MS	3.1	creation and revisions to opening statement documents
12/14/2017	AD	0.3	edit proposed order .3
12/14/2017	JS	0.5	Communication with Trial Support re: arranging delivery, etc. of trial exhibits
12/14/2017	MS	5.4	preparation of clients for testimony
12/14/2017	MR	3.5	Preparation for trial: continue to address/remedy problem with required hotspot device
12/14/2017	AG	0.1	ECF Filing of MOTION to Substitute PARTY PURSUANT TO FED. R.CIV. P. 25(A)
12/14/2017	MM	0.5	Organize notes following client interviews
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#517 P. TRIAL BRIEF)
12/14/2017	AD	0.7	edit motion for substitution of party .7
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#518 Joint Neutral Statement of the Case)
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#523 P. MOTION to Substitute PARTY PURSUANT TO FED. R.CIV. P. 25(A))
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#513 ORDER [510] Application for Leave to Appear PHV DuCharme)
12/14/2017	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#519 P. Proposed Voir Dire)
12/14/2017	MM	2	Call client for pretrial preparation interview

Date	Staff	Amount of Time	Description
			review trial exhibits to label who each exhibit relates to for internal use by attorneys
12/14/2017	ME	1.4	during trial
12/14/2017	JF	0.1	JF/ME discuss latest settlement status
12/14/2017	ME	0.1	telephone call from trial witness about travel logistics
12/14/2017	MM	3.1	Call client for pretrial preparation interview
			Transfer documents recd from ECF system to docket file and create file copy (Docket#520
12/14/2017	CLER	0.1	P. Proposed Jury Instructions)
12/14/2017	ME	0.1	JF/ME discuss latest settlement status
12/15/2017	JK	13	TRA Travel back and forth from airport for trial.
12/15/2017	MS	1.2	revisions and evaluations of rational settlement model
12/15/2017	MM	0.2	JF/MM: Discuss schedule of client preparation for trial
12/15/2017	MM	1.3	Organize notes from client calls (0.3); review and revise direct examination outline (1.0)
12/15/2017	MS	1.4	call w/ various named plaintiffs re settlement authority
12/15/2017	CLER	0.1	create PDF format of document recd from client (acknowledgment/agreement)
			Transfer documents recd from ECF system to docket file and create file copy (Docket#529
			D. MOTION to Preclude P. Trial Exhibits 268, 269, 270, and 271 and the Testimony of P.
12/15/2017	CLER	0.1	"Fact Witness," Jason Kandel)
			review trial exhibits to label who each exhibit relates to for internal use by attorneys
12/15/2017	ME	1.2	during trial
12/15/2017	MS	1.1	various calls with Panos and Boudreau
			Transfer documents recd from ECF system to docket file and create file copy (Docket#528
			MINUTE ORDER - Due to a delay in the Court's current trial, jury selection in this matter
12/15/2017	CLER	0.1	will begin on Tuesday, 12.19. 2017)
12/15/2017	MS	3.6	revisions to opening statement
			Fix sync of case docs on external hard drive .9; Perform final preparation of laptops and
12/15/2017	MR	2.1	external hard drive for trial 1.2;
12/15/2017	JF	0.2	JF/MM: Discuss schedule of client preparation for trial
12/15/2017	MS	2.1	preparing materials for transport to WA
12/15/2017	MR	0.1	CM/MR Confer on case costs
12/15/2017	MS	2.9	client preparation for testimony
12/15/2017	ME	0.1	JF/ME clarify witness's travel dates
12/15/2017	MM	2.8	Call client for pretrial preparation interview
12/15/2017	JF	0.1	JF/ME clarify witness's travel dates
12/15/2017	JS	16.5	11:00am Fri.-2:30am Sat Travel
12/15/2017	ME	0.1	left voicemail for trial witness about rescheduling prep call
			Transfer documents recd from ECF system to docket file and create file copy (Docket#525
12/15/2017	CLER	0.3	P. NOTICE OF DEPO DESIGNATIONS)
12/15/2017	MS	0.4	MS/MD/MM: discuss direct examination outline
12/15/2017	JF	6.4	Prepare for trial proceedings, witness outreach
12/15/2017	MR	0.1	Email CM about payment for invoice from printer for case documents
12/15/2017	MM	0.4	MS/MD/MM: discuss direct examination outline
12/15/2017	CM	1.6	update case fees and costs for possible settlement
12/15/2017	CM	0.1	call from opt-in re change in contact information, case update
			Transfer documents recd from ECF system to docket file and create file copy (Docket#527
12/15/2017	CLER	0.1	D. OBJECTIONS re [526] Objections to P. Deposition Counterdesignations)
12/15/2017	MM	0.4	Revise direct examination outlines for snacks and morning foods testifying plaintiffs
12/15/2017	MD	0.4	MS/MD/MM: discuss direct examination outline

Date	Staff	Amount of Time	Description
12/15/2017	MR	0.3	Add last 3 files from JF to external drive .2; email info to JK about last 3 files .1
12/15/2017	AG	0.2	prepare subpoena for appearance of client
12/15/2017	MM	0.9	Prepare notes and files to bring to trial
12/15/2017	ME	1.9	compile information needed for trial day sheet
			Transfer documents recd from ECF system to docket file and create file copy (Docket#526
12/15/2017	CLER	0.3	D. NOTICE OF DEPOSITION DESIGNATIONS)
12/15/2017	MM	0.5	Organize notes following client preperation interview call
12/15/2017	ME	0.1	file electronic deposition transcript in case folder
12/15/2017	CM	0.1	CM/MR Confer on case costs
12/15/2017	ME	1	verify accuracy of labels needed for internal use on master exhibit list
12/15/2017	AN	0.1	Telephone call regarding call scheduled with Attorney
12/16/2017	JS	13.75	Travel Sat 12:00pm Sun-1:45am
12/18/2017	JS	0.4	Call to witness re settlement
12/18/2017	JS	0.1	Leave voicemail re settlement
12/18/2017	CM	0.4	run updated client contact list in TM .3, call from client re status of case .1
12/18/2017	JS	0.1	Leave voicemail re settlement update
12/18/2017	JS	0.1	Leave voicemail re: settlement
12/18/2017	JS	0.2	Call to discuss settlement
12/18/2017	JS	0.3	Call for settlement update
12/18/2017	JS	0.3	Call to inform of settlement
12/18/2017	JS	0.2	JS/JF Conference call with travel agent re: cancellations
12/18/2017	AG	0.2	prepare shipping label for return shipment of trial materials
12/18/2017	JF	0.2	JS/JF Conference call with travel agent re: cancellations
12/18/2017	JS	0.1	Leave voicemail re settlement
12/18/2017	CLER	0.1	create PDF format of document recd from client (acknowledgment/agreement AB)
12/18/2017	CM	0.2	MD/JF Check-in re mail out of notice to opt-ins who were unresponsive to discovery
12/18/2017	JS	0.5	Call re settlement
12/18/2017	JF	0.2	MD/JF Check-in re mail out of notice to opt-ins who were unresponsive to discovery
12/18/2017	JS	0.1	Leave voicemail re settlement
12/18/2017	JF	3.2	Update current plaintiff list to prepare for email send-off re news of settlement
12/18/2017	CLER	0.1	create PDF format of document recd from client (acknowledgment/agreement)
12/18/2017	JS	0.3	Call re settlement
12/18/2017	JS	0.2	Send return label to Naegeli
			Prepare envelopes and letters for mailout to opt-ins dismissed from the case (no
12/18/2017	JF	2.2	response to discovery)
12/19/2017	JS	0.4	Call re settlement update
12/19/2017	CM	0.1	CM/MR Confer on refunds of hotel reservations and flights
12/19/2017	JF	0.5	MR/JF Discuss proposed settlement outcome
12/19/2017	MR	0.5	MR/JF Discuss proposed settlement outcome
12/19/2017	MM	0.2	Review and revise email to clients regarding settlement
12/19/2017	JS	0.5	Call re settlement
12/19/2017	JS	0.4	JS/JF Discuss frequently asked questions re settlement
			Respond to email query about responses to Kellogg phone calls subsequent to
12/19/2017	JS	0.2	dissemination of email update re: settlement
12/19/2017	MS	0.2	review and revise email for class re settlement
12/19/2017	CLER	1	Prepare mailing to clients (informing they are removed from case)

Date	Staff	Amount of Time	Description
12/19/2017	JS	0.1	Email to Naegeli re: keeping entire set of exhibits
12/19/2017	MR	0.1	CM/MR Confer on refunds of hotel reservations and flights
12/19/2017	CM	0.1	call from client re questions re settlement process
12/19/2017	AN	0.3	Telephone call from Plaintiff to discuss settlement
12/19/2017	JF	0.4	JS/JF Discuss frequently asked questions re settlement
12/19/2017	JK	2.4	JK Begin creation of allocation tool.
12/19/2017	AN	0.2	Call from Plaintiff with questions about settlement
12/19/2017	JS	0.4	Call re fears of retaliation
12/19/2017	JS	0.2	JS/MR Discuss possibility of refunds for hotel reservations and flights
12/19/2017	JS	0.2	Call re settlement
12/19/2017	MR	0.2	JS/MR Discuss possibility of refunds for hotel reservations and flights
12/19/2017	CLER	0.1	PCF client (confirmed address/status)
12/20/2017	MD	0.2	JK/MD discuss how to proceed with allocation
12/20/2017	JK	0.8	JK Determine cutoff date for morning Foods Damages
12/20/2017	CLER	0.2	PCF client (status)
12/20/2017	JK	0.8	JK Recalculate Allocation
12/20/2017	JK	0.8	JK Remove all non damage Morning Foods foods weeks from damage calculations
12/20/2017	ME	0.3	telephone call from intake with questions about case
12/20/2017	JK	0.8	JK Remove all non damage Morning Foods foods weeks from damage calculations
12/20/2017	CLER	0.1	create PDF format of document recd from client (acknowledgment/agreement) indicate named plaintiffs and plaintiffs who sat for depositions in settlement allocation
12/20/2017	ME	0.3	sheet
12/20/2017	JS	0.3	Update case page with current status
12/20/2017	JS	0.2	Call for update
12/20/2017	JS	0.4	Correspondence with Trial Support re: shipping binders and returning exhibits to GSD
12/20/2017	MS	0.4	drafting web posting
12/20/2017	JS	0.1	Email FedEx prepaid labels for shipping
12/20/2017	JK	0.2	JK/MD discuss how to proceed with allocation
12/20/2017	ME	0.1	review draft case update for website
12/20/2017	MM	0.1	Review and revise language for web posting and client correspondence
12/21/2017	MR	0.1	Email considerations regarding choice of claims administrator
12/22/2017	ME	0.1	email case update to opt-in per request
12/22/2017	CLER	0.2	PCF client (confirming name change and address)
12/22/2017	ME	0.1	telephone call from opt-in for case update
12/26/2017	CM	0.3	calls from opt-ins re questions re settlement
12/27/2017	MA	0.1	call from claimant for case update
12/27/2017	MA	0.1	call from plaintiff for case update
1/2/2018	MR	0.5	Pull contacts list from TM for para JF .4; sort for clients in list .1
1/2/2018	JF	0.2	MA/JF JF to inquire about the settlement process (allocation of individual damages & settlement terms)
1/2/2018	MD	0.1	MD/JF Review the task to assemble a finalized list of opt-ins and their states of residence (claims administrator quotes)
1/2/2018	JF	0.1	MD/JF Review the task to assemble a finalized list of opt-ins and their states of residence (claims administrator quotes)
1/2/2018	JF	0.2	JF/ME review where to verify whether an opt-in has been dismissed for the case and/or is receiving any damages from settlement
1/2/2018	ME	0.2	ME/JF Check-in re settlement agreement status (questions from plaintiffs)

Date	Staff	Amount of Time	Description
			JF/ME review where to verify whether an opt-in has been dismissed for the case and/or is
1/2/2018	ME	0.2	receiving any damages from settlement
1/2/2018	JF	0.2	Call with plaintiff re case update (settlement)
1/2/2018	JF	0.2	ME/JF Check-in re settlement agreement status (questions from plaintiffs)
1/2/2018	JF	2.3	Reply to emails from plaintiffs related to case settlement
1/2/2018	MD	0.2	MD/JF Discuss the settlement process in order to better navigate plaintiff inquiries
1/2/2018	MR	0.3	MR/JF Discuss litigation strategies and settlement negotiations
1/2/2018	JF	1.6	Assemble/cross-check the list of plaintiffs eligible to receive settlement
1/2/2018	ME	0.1	left voicemail for opt-in; returning her call
1/2/2018	MR	0.2	MR/JF Discuss the task to pull client records from TM
1/2/2018	JF	0.2	MD/JF Discuss the settlement process in order to better navigate plaintiff inquiries
1/2/2018	JF	0.3	MR/JF Discuss litigation strategies and settlement negotiations
			MA/JF JF to inquire about the settlement process (allocation of individual damages &
1/2/2018	MA	0.2	settlement terms)
1/2/2018	JF	0.2	MR/JF Discuss the task to pull client records from TM
1/3/2018	JF	0.2	Reach out to plaintiffs with undeliverable addresses
			AD/JF Check-in re requirement of death certificate for plaintiff eligible to collect a portion
1/3/2018	AD	0.1	of the settlement
1/3/2018	AG	0.2	research updated address (resent ltr of not part of) .10 updated contact information .10
1/3/2018	AG	0.2	research updated address (resent ltr of not part of) .10 updated contact information .10
1/3/2018	JF	1.2	Return emails to plaintiffs re status of settlement
			file hard copies of deposition transcripts and exhibits that were pulled for trial
1/3/2018	CLER	0.7	preparation
1/3/2018	JS	0.1	Call for update
			AD/JF Check-in re requirement of death certificate for plaintiff eligible to collect a portion
1/3/2018	JF	0.1	of the settlement
1/3/2018	JF	1.8	Finalize the list of plaintiffs eligible to receive a portion of the settlement
1/3/2018	MR	0.6	MR/JF Review the breakdown of individual allocation computations
1/3/2018	JF	0.6	MR/JF Review the breakdown of individual allocation computations
1/3/2018	MD	0.1	MD/JF Check-in re projected workload (post-settlement)
1/3/2018	JF	0.1	MD/JF Check-in re projected workload (post-settlement)
1/4/2018	ME	0.1	telephone call from opt-in to verify contact information
1/5/2018	AN	0.1	Research sending text by email using online data service
			MS/JF Review the process to gather relevant documents from family of a deceased
1/5/2018	JF	0.1	plaintiff to make sure the settlement is properly allocated and received
1/5/2018	JF	0.1	MR/JF Discuss the wording of email to plaintiff re settlement allocations
1/5/2018	MR	0.1	MR/JF Discuss the wording of email to plaintiff re settlement allocations
1/5/2018	JF	1.2	Respond to email/follow up with plaintiffs eligible for settlement
			MS/JF Review the process to gather relevant documents from family of a deceased
1/5/2018	MS	0.1	plaintiff to make sure the settlement is properly allocated and received
1/5/2018	JF	0.2	Locate/use text number to be used to contact a dismissed plaintiff
1/5/2018	JF	0.5	MR/JF Discuss the method and amounts of individual plaintiff damage allocations

Date	Staff	Amount of Time	Description
1/5/2018	MR	0.5	MR/JF Discuss the method and amounts of individual plaintiff damage allocations
1/8/2018	JF	0.2	Call from plaintiff re settlement
1/8/2018	AG	0.2	conduct address verification
1/8/2018	JF	0.4	Call from plaintiff re settlement
1/8/2018	JK	0.1	jk/MD review future of Kellogg case
1/8/2018	MD	0.1	jk/MD review future of Kellogg case
1/8/2018	JF	0.1	AG/JF Task to verify mailing address for plaintiff (re settlement allocation)
1/8/2018	AG	0.1	AG/JF Task to verify mailing address for plaintiff (re settlement allocation)
1/9/2018	JK	0.4	JK add addresses into allocation spreadsheet.
1/9/2018	JK	0.1	JK/JF Discuss location of addressees that can be imported into the allocation spreadsheet.
1/9/2018	JF	0.1	JK/JF Discuss location of addressees that can be imported into the allocation spreadsheet.
1/10/2018	ME	0.3	telephone call from opt-in about settlement
1/10/2018	AG	0.2	conduct address search .10 remail RTS ltr with updated address .10
1/10/2018	AG	0.2	conduct address search .10 remail RTS ltr with updated address .10
1/11/2018	AG	0.2	conduct address search .10 remail RTS ltr with updated address .10
1/11/2018	JF	0.1	AG/JF Check-in re the folders that were intended to be reviewed by the jury for the purposes of the trial
1/11/2018	AG	0.1	AG/JF Check-in re the folders that were intended to be reviewed by the jury for the purposes of the trial
1/12/2018	AG	0.2	Prepare Notice of Filing of Consents to Sue and Consents to Sue for filing
1/12/2018	CLER	0.3	Data Entry of contact information .10 Prepare welcome ltr to new client .20
1/16/2018	JS	0.3	Call for update on settlement process
1/16/2018	AN	0.1	Telephone call from client about case
1/18/2018	JS	0.2	Call to update address, case update
1/18/2018	JF	0.6	Update call with plaintiff eligible to receive settlement
1/18/2018	JF	0.3	Draft/send to team email re confidentiality provision of the settlement agreement draft
1/18/2018	JF	0.2	CM/JF Discuss the limits of the confidentiality clause typically included in the settlement agreement
1/18/2018	CM	0.2	CM/JF Discuss the limits of the confidentiality clause typically included in the settlement agreement
1/19/2018	JF	0.7	Follow-up calls from Thomas plaintiffs re settlement
1/22/2018	JS	0.4	Call with settlement questions
1/22/2018	JF	0.3	Call from plaintiff re settlement
1/22/2018	JF	0.2	Reach out to plaintiffs via email re settlement questions
1/22/2018	MS	0.9	review and comment on Kellogg's proposed settlement agreement
1/23/2018	MD	0.3	md/ms confer about edits to settlement agreement 0.3
1/23/2018	MS	0.3	md/ms confer about edits to settlement agreement 0.3
1/23/2018	JS	0.1	JS/JF Discuss a phone call re settlement
1/23/2018	JF	0.1	JS/JF Discuss a phone call re settlement
1/24/2018	JF	0.5	Review/suggest edits to the latest settlement agreement draft
1/25/2018	JF	0.1	Email lead attorney re outstanding receipts received from plaintiff (reimbursement for travel expenses associated with deposition)
1/25/2018	MD	1.5	edit settlement agreement 1.5
1/25/2018	MM	0.1	Review case activity report on scheduling order
1/26/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Court was notified this case settled.Settlement papers are due by 2.6.2018)



Date	Staff	Amount of Time	Description
1/29/2018	JF	0.6	Call with plaintiff re case update (settlement)
1/29/2018	JF	0.7	Call with plaintiff re case update (settlement)
1/29/2018	JF	0.4	Search for relevant documents re inquiry from bankruptcy attorney on behalf of the plaintiff
1/30/2018	MD	0.1	email local and of counsel re fees 0.1
1/30/2018	MD	0.1	email bankruptcy attorney about settlement 0.1
1/30/2018	MD	0.2	prep for call with defense counsel re settlement 0.2
1/30/2018	MD	2.5	draft motion for settlement approval 2.5
1/30/2018	MD	0.2	edit ad for ad agencies 0.2
1/30/2018	MD	0.1	md/cm confer about needs for calculating costs 0.1
1/31/2018	JS	0.2	Email to travel agency requesting final billing
1/31/2018	CM	0.5	update case costs
1/31/2018	AG	0.1	ECF Filing of Stipulated MOTION for Extension of Time to File Motion to Request Approval of the Settlement and Proposed Order
1/31/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#530 - Stipulated MOTION for Extension of Time to File Motion to Request Approval of the Settlement and Proposed Order)
1/31/2018	JS	0.4	Call for update on settlement process
2/2/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Settlement papers now due by 2/23/2018)
2/5/2018	JF	0.2	AD/JF Discuss the bankruptcy outreach tracking as it relates to settlement
2/5/2018	AD	0.2	AD/JF Discuss the bankruptcy outreach tracking as it relates to settlement
2/5/2018	JS	0.1	Send billing reports to CM for reconciliation of billing and as resource for fees and costs brief.
2/5/2018	AD	0.2	Review settlement agreement .2
2/5/2018	AD	0.4	Research claim of opt-in .4
2/5/2018	AD	0.3	Call with bankruptcy counsel .3
2/6/2018	MS	1.2	review and memo on revised settlement agreement
2/6/2018	JS	0.3	Call for update
2/6/2018	JF	0.1	Respond to email inquiry re settlement distribution
2/8/2018	ME	0.1	ME/JF Check-in re settlement agreement
2/8/2018	JF	0.1	ME/JF Check-in re settlement agreement
2/8/2018	AD	0.2	review clients claim and respond to email from bankruptcy attorney .2
2/8/2018	JS	0.3	Call for settlement update, updated contact information
2/8/2018	MS	1.1	review and comment on settlement agreement draft
2/9/2018	JF	0.4	Call with plaintiff re settlement
2/13/2018	MD	0.1	MD/MS discuss using 2-step settlement process
2/13/2018	MS	0.1	MD/MS discuss using 2-step settlement process
2/14/2018	JS	0.3	JS/JF move files to basement for storage
2/14/2018	JF	0.3	JS/JF move files to basement for storage
2/14/2018	MD	0.1	MD/JF Check-in re the status of the severance agreement
2/14/2018	ME	0.2	ME/JF Check-in re handling of individual settlement allocation inquiries calls
2/14/2018	JF	0.2	ME/JF Check-in re handling of individual settlement allocation inquiries calls
2/14/2018	JF	0.1	MD/JF Check-in re the status of the severance agreement
2/14/2018	JF	0.7	Call with plaintiff re settlement update
2/14/2018	CLER	0.1	PCF client (update contact information)
2/15/2018	JF	0.7	Call with plaintiff re settlement update
2/15/2018	JF	0.4	Call with plaintiff re settlement update
2/15/2018	MS	1.1	review and revise form of notice for settlement
2/15/2018	MD	1	edit notice form 1

Date	Staff	Amount of Time	Description
2/15/2018	MD	0.5	MD/MS discuss settlement notice to class
2/15/2018	ME	0.1	telephone call from opt-in to update contact information
2/15/2018	MS	0.5	MD/MS discuss settlement notice to class
2/15/2018	MS	0.5	review and comment on draft notice to class
2/16/2018	JF	0.4	Call from plaintiff re the settlement status/process
2/16/2018	JF	0.2	Draft/send email to JS re categories of excluded plaintiffs and links to those categories
2/16/2018	MD	0.3	MD/MS discuss form of notice for settlement
2/16/2018	MS	0.4	review and revise form of notice for settlement
2/16/2018	MS	0.3	MD/MS discuss form of notice for settlement
2/16/2018	MD	1	edit notice form 1.0
2/20/2018	JF	0.5	Field calls/communications from plaintiffs re settlement process
2/20/2018	MD	0.3	confer with defense counsel re changes to settlement agreement 0.3
2/20/2018	MD	0.5	send edits to defense counsel re settlement agreement 0.5
2/20/2018	JF	0.7	Crosscheck lists of plaintiffs excluded from settlement
2/20/2018	JS	0.1	Send email case update per web request for information.
2/20/2018	JF	0.6	Call with plaintiff re settlement update
2/21/2018	JF	0.2	MD/JF Discuss the proposed settlement agreement notice and timeline
2/21/2018	MD	0.2	MD/JF Discuss the proposed settlement agreement notice and timeline
2/21/2018	JF	0.1	Call with plaintiff re settlement/case update
2/21/2018	MD	0.5	edit and review settlement agreement 0.5
2/21/2018	ME	0.1	update client's contact information in client database
2/21/2018	ME	0.1	reply to email from opt-in with update contact information
2/22/2018	MR	0.3	Pull case contacts excel sheet from Time Matters server .1; configure excel sheet .1, send email with link to excel sheet to JF .1
2/22/2018	AN	0.3	GA Telephone call from claimant with questions about settlement
2/22/2018	JF	0.1	MR/JF Request to pull updated contact information/address records for Kellogg plaintiffs eligible for settlement
2/22/2018	MR	0.1	MR/JF Request to pull updated contact information/address records for Kellogg plaintiffs eligible for settlement
2/23/2018	JF	0.1	Send plaintiff a brief email update re settlement process status
2/23/2018	CLER	0.3	Data Entry of contact information .10 Prepare welcome ltr to new client .20
2/23/2018	JF	0.1	Send email to paras re tracking of address changes of plaintiffs eligible for settlement
2/23/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#532 Stipulated MOT for Extension of Time to File Request for Approval of the Settlement and Proposed Order)
2/23/2018	JS	0.1	JS/JF Review the location of spreadsheet for tracking plaintiff address information (for settlement purposes)
2/23/2018	JF	0.1	JS/JF Review the location of spreadsheet for tracking plaintiff address information (for settlement purposes)
2/23/2018	MS	0.3	review final settlement agreement and notice form
2/23/2018	MD	0.1	MD/MS discuss final settlement agreement and notice form
2/23/2018	MS	0.1	MD/MS discuss final settlement agreement and notice form
2/26/2018	AD	0.2	respond to bankruptcy attorney .2
2/26/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Motion terminated: [532] Stipulated MOTION for Extension of Time)
2/26/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Deadline extended - Dismissal/Settlement papers now due by 3/14/2018)
2/26/2018	JF	0.2	MD/JF Check-in re draft and review of the website/email update

Date	Staff	Amount of Time	Description
2/26/2018	MD	0.2	MD/JF Check-in re draft and review of the website/email update
2/26/2018	JF	0.1	JS/JF Brief check-in re the task to post case update on website
2/26/2018	JF	0.9	Draft/email to team case update
2/26/2018	JS	0.1	JS/JF Brief check-in re the task to post case update on website
Transfer documents recd from ECF system to docket file and create file copy (Docket#533			
2/26/2018	CLER	0.1	- STIPULATION AND ORDER [532] Stipulated MOTION for Extension of Time)
2/26/2018	ME	0.1	proof read website update
2/27/2018	JF	1.7	Send email/respond to settlement update to all settlement-eligible plaintiffs in the case
2/27/2018	JF	0.1	Send email to team re bankruptcy question from plaintiff eligible for settlement
2/27/2018	JF	0.2	Call with plaintiff re case update
2/28/2018	ME	0.3	telephone call from opt-in about contact information of potential class members
2/28/2018	JF	0.2	Call with plaintiff re settlement update
2/28/2018	JF	0.2	Call with plaintiff re settlement process
2/28/2018	JF	0.2	Call from plaintiff re settlement update
2/28/2018	JF	0.3	Call with plaintiff re settlement update
2/28/2018	JF	0.6	Respond to email queries re settlement process status
3/5/2018	MD	4.5	draft motion for settlement approval 4.5
3/5/2018	JF	0.1	MD/JF Discuss the logistics of mailing out a copy of the finalized settlement agreement to named plaintiffs
3/5/2018	MD	0.2	prepare allocation for plaintiffs 0.2
3/5/2018	JF	0.1	MD/JF Brief review of task to email settlement agreement out to Named Plaintiff/state representatives
3/5/2018	JF	0.2	Edit wording of an email going out to Named plaintiffs re settlement agreement
3/5/2018	MD	0.1	MD/JF Discuss the logistics of mailing out a copy of the finalized settlement agreement to named plaintiffs
3/5/2018	JS	0.3	Call for settlement allocation
3/5/2018	JF	0.5	Respond to emails re latest case update (finalizing of the settlement agreement)
3/5/2018	JF	0.2	Respond to voicemails from plaintiffs eligible for settlement
3/5/2018	JF	0.4	Call with plaintiff re settlement
3/5/2018	JF	0.7	Draft/email out employment agreements to Named plaintiffs
3/5/2018	MD	0.1	MD/JF Brief review of task to email settlement agreement out to Named Plaintiff/state representatives
3/6/2018	MD	0.2	MD/MA discuss proofreading project for preliminary approval
3/6/2018	MA	0.2	MD/MA discuss proofreading project for preliminary approval
3/6/2018	MA	1.4	proofread motion for preliminary approval
3/8/2018	JF	0.2	MD/JF Check-in re the latest status of executed settlement agreements received from plaintiffs
3/8/2018	JF	0.2	Call with Named plaintiff re settlement agreement
3/8/2018	MD	0.2	MD/JF Check-in re the latest status of executed settlement agreements received from plaintiffs
3/8/2018	ME	0.1	format plaintiff's signature page for settlement agreement
3/8/2018	JF	0.8	Outreach to Named plaintiffs to return signed settlement agreement to us
3/8/2018	ME	0.1	format plaintiff's signature page for settlement agreement
3/8/2018	JF	0.4	Process incoming settlement agreements into the case folder

Date	Staff	Amount of Time	Description
3/9/2018	JF	0.2	MD/JF Check-in re the latest status of executed settlement agreements received from plaintiffs
3/9/2018	JF	0.4	Field/make calls to named plaintiffs re signing of the final settlement agreement
3/9/2018	MD	0.2	MD/JF Check-in re the latest status of executed settlement agreements received from plaintiffs
3/9/2018	ME	2.1	format brief for final settlement approval: proofread, create TOA and TOC
3/9/2018	ME	0.1	proofread proposed order for settlement agreement
3/12/2018	MD	0.2	contact claims administrator re updating quote 0.2
3/12/2018	MD	0.4	review edits to preliminary approval motion 0.4
3/12/2018	ME	0.9	proofread Parties Joint Motion for Preliminary approval of settlement
3/13/2018	ME	0.1	MD/ME discuss additional edits to parties' joint motion for preliminary settlement approval
3/13/2018	AN	0.1	Telephone call from plaintiff regarding fax he sent
3/13/2018	MD	0.5	draft declaration 0.5
3/13/2018	MA	0.2	MA/ME review services needed from settlement administrator to prepare for call with potential settlement administration company
3/13/2018	ME	0.2	MA/ME review services needed from settlement administrator to prepare for call with potential settlement administration company
3/13/2018	ME	0.2	send email to MD outlining services needed from settlement administrator to prepare for call with potential administration company
3/13/2018	MD	0.1	MD/ME review task of determining services needed from settlement administrator
3/13/2018	ME	0.1	MD/ME review task of determining services needed from settlement administrator
3/13/2018	MD	0.1	MD/ME discuss additional edits to parties' joint motion for preliminary settlement approval
3/14/2018	ME	0.1	JS/ME discuss edit needed to settlement agreement for joint motion for preliminary settlement approval
3/14/2018	JS	0.1	JS/ME discuss edit needed to settlement agreement for joint motion for preliminary settlement approval
3/14/2018	MD	1	edit motion to preliminarily approve settlement 1.0
3/14/2018	MD	0.2	MD/JF Discuss the paralegal coverage re settlement process
3/14/2018	ME	1.1	prepare exhibits to joint motion for prelim settlement approval
3/14/2018	ME	0.6	proofread declaration in support of joint motion for preliminary settlement approval
3/14/2018	MD	0.2	MD/ME review status of joint motion for preliminary approval and additional tasks needed for its completion
3/14/2018	JF	0.2	MD/JF Discuss the paralegal coverage re settlement process
3/14/2018	ME	0.2	MD/ME review status of joint motion for preliminary approval and additional tasks needed for its completion
3/14/2018	MD	0.5	call with potential claims administrator 0.5
3/14/2018	ME	0.4	MD/ME call with potential claims administrator to determine if we want to use their services for settlement purposes
3/14/2018	MD	0.5	file motion to preliminarily approve settlement 0.5
3/14/2018	MD	1	edit declaration 1.0
3/14/2018	MD	0.4	MD/ME call with potential claims administrator to determine if we want to use their services for settlement purposes
3/14/2018	MD	0.2	email defense counsel re settlement terms 0.2

Date	Staff	Amount of Time	Description
3/14/2018	ME	0.7	format declaration in support of joint motion for preliminary settlement approval
3/14/2018	MD	0.1	email defense counsel signatures for settlement
3/14/2018	ME	2	proofread and make formatting updates to joint motion for preliminary settlement approval
3/14/2018	JS	0.2	Edit Final Settlement Agreement
3/14/2018	ME	0.1	MD/ME review tasks needed to complete for joint motion for preliminary settlement approval
3/14/2018	MD	0.1	MD/ME review tasks needed to complete for joint motion for preliminary settlement approval
3/15/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#534 P. Stipulated MOTION for Preliminary Settlement Approval and to Authorize Notice)
3/15/2018	MD	0.1	MD/JF Check-in re filing of settlement agreement
3/15/2018	JF	0.1	MD/JF Check-in re filing of settlement agreement
3/16/2018	AN	0.2	Call from plaintiff for update on settlement process
3/16/2018	AN	0.1	Call from plaintiff for case update
3/19/2018	ME	0.8	MD/ME/JS/JF Meet to discuss the division of post-settlement responsibilities (drafting of FAQs, website/email updates, settlement processing deadlines)
3/19/2018	MD	0.8	MD/ME/JS/JF Meet to discuss the division of post-settlement responsibilities (drafting of FAQs, website/email updates, settlement processing deadlines)
3/19/2018	JS	0.8	MD/ME/JS/JF Meet to discuss the division of post-settlement responsibilities (drafting of FAQs, website/email updates, settlement processing deadlines)
3/19/2018	JS	0.7	Draft current and future website updates, and parallel mass-email copy for settlement status updates.
3/19/2018	MD	0.5	edit plaintiffs' declaration
3/19/2018	JF	0.8	MD/ME/JS/JF Meet to discuss the division of post-settlement responsibilities (drafting of FAQs, website/email updates, settlement processing deadlines)
3/19/2018	ME	1.5	draft declaration template for non-named plaintiffs and non-deponents in support of service awards
3/19/2018	JS	0.8	Review Joint Motion for Prelim. Approval
3/20/2018	JF	0.2	Review website/email update
3/20/2018	ME	0.2	edit draft website updates for filing of preliminary settlement approval and post-preliminary settlement approval update
3/20/2018	JF	0.3	Review drafts of declarations needed for final fairness hearing (settlement process)
3/20/2018	JF	1.7	Draft FAQ Settlement sheet
3/20/2018	ME	0.3	make edits to draft client FAQ regarding settlement notice
3/20/2018	ME	0.1	telephone call from opt-in to update contact information
3/20/2018	ME	1.2	finish drafting declarations in support of service awards
3/20/2018	JF	0.1	MD/JF task to check on inclusion of deponents on the witness list prepared for trial
3/20/2018	MR	0.6	MR/JF Discuss damage calculations and risk assessment (re settlement)
3/20/2018	JF	2.3	Draft Kellogg settlement FAQ to effectively field client calls related to settlement
3/20/2018	JS	0.2	Call for case update
3/20/2018	ME	0.1	review attorney edits to declarations in support of service awards
3/20/2018	MD	0.1	MD/JF task to check on inclusion of deponents on the witness list prepared for trial
3/20/2018	JF	0.6	MR/JF Discuss damage calculations and risk assessment (re settlement)

Date	Staff	Amount of Time	Description
3/20/2018	JS	0.2	Call for case update
3/20/2018	JS	0.5	Review and comment on FAQ
3/20/2018	JF	0.3	Call with plaintiff re settlement update
3/21/2018	JS	1.3	Queue and send email update to all current settlement classmembers with case status update
3/21/2018	JS	0.3	Update website with current case status post
3/21/2018	ME	0.1	telephone call from opt-in for case update
3/21/2018	ME	0.8	call opt-ins whose emails bounced back after case update was sent
3/21/2018	JS	0.1	Update contact information per client request via email
3/21/2018	JS	0.1	Send settlement agreement, proposed notice, and joint motion for prelim approval to opt-in per request.
3/21/2018	JS	0.2	Redact classmember names from settlement agreement
3/21/2018	JS	0.1	Respond to opt-in email
3/21/2018	JS	0.1	Respond to opt-in email
3/21/2018	ME	0.2	identify missing deponent from list of deposed plaintiffs
3/21/2018	ME	0.2	review attorney edits to draft FAQ for opt-ins regarding settlement notice
3/21/2018	MD	0.2	JS/MD discuss proper handling and dissemination of materials requested by opt-in.
3/21/2018	JF	0.6	Review/update Kellogg settlement FAQ sheet
3/21/2018	ME	1.5	add information to draft opt-in FAQ regarding settlement for attorney review
3/21/2018	JS	0.1	JS/ME review discuss settlement update with opt-in callers
3/21/2018	JS	0.2	JS/MD discuss proper handling and dissemination of materials requested by opt-in.
3/21/2018	ME	0.1	telephone call from opt-in for case update
3/21/2018	ME	0.1	JS/ME review discuss settlement update with opt-in callers
3/21/2018	JS	0.1	Email to opt-in regarding website update
3/21/2018	ME	1.2	carefully read settlement agreement and proposed notice to assist with preparation of opt-in FAQ regarding settlement notice
3/21/2018	JS	0.1	Update contact information per opt-in email
3/21/2018	ME	0.1	send case update email to opt-in
3/21/2018	ME	0.2	ME/JF Discuss the process to account for dysfunctional email addresses
3/21/2018	JF	0.2	Call with plaintiff re settlement agreement update
3/21/2018	MD	0.5	edit FAQ for settlement questions by plaintiffs 0.5
3/21/2018	ME	0.1	telephone call from opt-in to verify email address
3/21/2018	JF	0.2	ME/JF Discuss the process to account for dysfunctional email addresses
3/22/2018	JF	0.4	Draft/email team re fielding of calls from families of deceased settlement-eligible plaintiffs and settlement-eligible plaintiffs involved in bankruptcy
3/22/2018	JF	0.3	Call with plaintiff re case update (settlement)
3/23/2018	MD	0.1	MD/JF Check in re distribution of notice process following the upcoming preliminary approval (settlement approval process)
3/23/2018	JF	0.1	AD/JF Check-in re attorney availability for fielding potential client settlement questions re bankruptcy and/or claims of deceased plaintiff
3/23/2018	JS	0.1	Update contact information per client email
3/23/2018	AD	0.1	AD/JF Check-in re attorney availability for fielding potential client settlement questions re bankruptcy and/or claims of deceased plaintiff
3/23/2018	JF	0.1	MD/JF Check in re distribution of notice process following the upcoming preliminary approval (settlement approval process)
3/26/2018	JS	0.1	Email responding to client questions about settlement
3/26/2018	JS	0.1	Email responding to client questions about settlement



Date	Staff	Amount of Time	Description
3/26/2018	ME	0.1	left voicemail for opt-in in response to his website request for more information
3/26/2018	JS	0.1	Email responding to client questions about settlement
3/26/2018	ME	0.5	edit draft plaintiff settlement FAQ for final review
3/26/2018	JS	0.1	Email responding to client questions about settlement
3/26/2018	AD	0.5	review declarations .5
3/26/2018	MD	0.1	review and edit FAQ for calls with clients re settlement
3/26/2018	ME	0	left voicemail for opt-in in response to his website request for more information
3/26/2018	ME	0.2	telephone call from opt-in for case update
3/26/2018	MD	0.2	MD/ME review method for calculating damages to be able to explain to opt-ins calling about settlement notice
3/26/2018	JS	0.1	Reply to request for information
3/26/2018	MD	0.2	edit declarations for final settlement approval 0.2
3/26/2018	JS	0.1	Email responding to client questions about settlement
3/26/2018	JS	0.1	Email responding to client questions about settlement
3/26/2018	ME	0.1	telephone call from opt-in regarding updated contact information
3/26/2018	ME	0.2	MD/ME review method for calculating damages to be able to explain to opt-ins calling about settlement notice
3/26/2018	ME	1.1	edit draft declarations in support of service payments for final attorney review
3/26/2018	JS	0.1	Update address per client email
3/26/2018	ME	0.1	email team draft declarations in support of service payments for final review
3/27/2018	JF	0.1	MR/JF Request to download settlement-eligible plaintiff list to cross-check mailing addresses before sending off to claims administrator
3/27/2018	AD	2.2	Edit settlement FAQ 2.2
3/27/2018	JF	0.2	Call with plaintiff re case update
3/27/2018	JF	0.2	MD/JF Check-in re individual allocation spreadsheet
3/27/2018	ME	2.1	verify that all addresses on allocation sheet to be sent to claims administrator are current per our client database
3/27/2018	MD	0.2	MD/JF Check-in re individual allocation spreadsheet
3/27/2018	ME	0.2	ME/JF Review the task to cross-check mailing addresses prior to sending to claims administrator (post-settlement process)
3/27/2018	MD	0.2	draft email to client re settlement 0.2
3/27/2018	MR	0.5	Pull new case contacts address list for JF
3/27/2018	JS	0.1	Email to client re: updates
3/27/2018	MD	0.1	MD/JF Check-in re task to cross-check mailing addresses for settlement-eligible plaintiffs (to be mailed out to claims administrator)
3/27/2018	JF	0.2	ME/JF Review the task to cross-check mailing addresses prior to sending to claims administrator (post-settlement process)
3/27/2018	MD	0.3	finalize spreadsheet to send to defense counsel and settlement administrator 0.3
3/27/2018	MR	0.1	MR/JF Review the finalized address pull from Time Matters to prepare addresses for submission to claims administrator
3/27/2018	MD	0.1	send spreadsheet to settlement administrator along with contract 0.1
3/27/2018	JF	0.1	ME/JF Discuss the project to cross-check addresses (given MR's shortcut)
3/27/2018	JF	0.1	MD/JF Check-in re task to cross-check mailing addresses for settlement-eligible plaintiffs (to be mailed out to claims administrator)
3/27/2018	MR	0.1	MR/JF Request to download settlement-eligible plaintiff list to cross-check mailing addresses before sending off to claims administrator
3/27/2018	ME	0.1	ME/JF Discuss the project to cross-check addresses (given MR's shortcut)

Date	Staff	Amount of Time	Description
			MR/JF Review the finalized address pull from Time Matters to prepare addresses for
3/27/2018	JF	0.1	submission to claims administrator
3/27/2018	JF	0.6	Review/proof/add edits to settlement FAQ review sheet
3/27/2018	JF	0.1	MD/JF Check-in re response to dissatisfied plaintiff
3/27/2018	AN	0.3	Call from plaintiff to discuss settlement process
3/27/2018	MD	0.1	MD/JF Check-in re response to dissatisfied plaintiff
3/28/2018	MD	0.1	respond to local counsel re court appearance 0.1
3/28/2018	JF	0.2	Call with client re settlement allocation
3/28/2018	JF	0.3	MD/JF Check-in re bankruptcy and deceased witness tracking
3/28/2018	MD	0.2	draft agenda for meeting with team re settlement 0.2
3/28/2018	MD	0.3	review and prep notice for settlement administrator 0.3
3/28/2018	MD	0.1	send email to settlement administrator re notice and approval by court 0.1
3/28/2018	MD	0.3	MD/JF Check-in re bankruptcy and deceased witness tracking
			MD/AD/ME/JS/JF Meet re the logistical process/designation of responsibilities following
3/29/2018	ME	0.9	the granting of the preliminary settlement approval awarded on 3/29/18
			MD/AD/ME/JS/JF Meet re the logistical process/designation of responsibilities following
3/29/2018	MD	0.9	the granting of the preliminary settlement approval awarded on 3/29/18
			MD/AD/ME/JS/JF Meet re the logistical process/designation of responsibilities following
3/29/2018	JS	0.9	the granting of the preliminary settlement approval awarded on 3/29/18
			MD/AD/ME/JS/JF Meet re the logistical process/designation of responsibilities following
3/29/2018	AD	0.9	the granting of the preliminary settlement approval awarded on 3/29/18
3/29/2018	ME	0.9	draft email to opt-ins about preliminary settlement approval
			Outreach named plaintiffs to inform them of the Court's decision of settlement's
3/29/2018	JF	2.8	preliminary approval
3/29/2018	CM	0.2	calls from opt-ins re status of case
			3/29/2018 JF 1.8 Follow up on bankruptcy/deceased plaintiffs tracking for the settlement administrator
			MD/AD/ME/JS/JF Meet re the logistical process/designation of responsibilities following
3/29/2018	JF	0.9	the granting of the preliminary settlement approval awarded on 3/29/18
			Compose and send email to all opt-ins with status update re: hearing for Preliminary
3/30/2018	JS	1.6	Approval
3/30/2018	AD	3	Track bankruptcy plaintiffs for settlement administration 3.0
			Generate email addresses to use for sending texts to multiple plaintiffs using online
3/30/2018	AN	0.2	search site Research text numbers for multiple plaintiffs
3/30/2018	AD	0.1	Call client leave voicemail .1
3/30/2018	AD	0.2	Call client .2
3/30/2018	AD	0.1	Call client .1
			Respond to plaintiffs contacted previously re their settlement claims given bankruptcy
3/30/2018	JF	0.2	proceedings
			MD/JF Check-in re process of providing documentation for deceased plaintiffs with
3/30/2018	MD	0.1	settlement administrator
3/30/2018	JS	0.8	Revise webpage copy due to case resolution
3/30/2018	JF	0.2	ME/JF Discuss the logistics of managing the settlement distribution process
3/30/2018	ME	0.2	ME/JF Discuss the logistics of managing the settlement distribution process
3/30/2018	MD	0.3	review FAQ re settlement 0.3

Date	Staff	Amount of Time	Description
3/30/2018	AD	0.5	review Faq .5
3/30/2018	AD	3	Coordinate bankruptcy clients for settlement administrator 3.0
3/30/2018	JF	0.3	AD/JF Discuss outreach to plaintiffs eligible for settlement who were involved in bankruptcy
3/30/2018	JF	0.1	MD/JF Check-in re process of providing documentation for deceased plaintiffs with settlement administrator
3/30/2018	JF	0.2	Respond to settlement administrator re her query
3/30/2018	AD	0.3	AD/JF Discuss outreach to plaintiffs eligible for settlement who were involved in bankruptcy
3/30/2018	ME	0.4	edit opt-in settlement FAQ guide .3; email to team requesting final review .1
4/2/2018	CM	0.1	call from opt-in re status of case
4/2/2018	ME	0.2	telephone call from intake interested in joining the case
4/2/2018	AG	0.2	prepare ltr to client (settlement/bankruptcy)
4/2/2018	JF	0.7	Field calls associated with involvement in bankruptcy proceedings
4/2/2018	AG	0.2	prepare ltr to client (settlement/bankruptcy)
4/2/2018	ME	0.1	ME/JF Check-in re assistance to disperse email communication re service payments to named plaintiffs/deponents
4/2/2018	JF	0.3	Call from plaintiff re settlement
4/2/2018	AG	0.2	prepare ltr to client (settlement/bankruptcy)
4/2/2018	CLER	0.1	PCF client (update address)
4/2/2018	JF	0.1	ME/JF Check-in re assistance to disperse email communication re service payments to named plaintiffs/deponents
4/2/2018	JS	0.6	Gather and forward address correction email responses to case update
4/2/2018	AD	0.2	AD/JF Discuss plaintiffs involved in bankruptcy (general check-in re process and status)
4/2/2018	CLER	0.1	PCF client (case update and address verification)
4/2/2018	AG	0.1	PCF update contact information
4/2/2018	JF	0.1	MD/JF Check-in re fielding of calls from settlement-eligible plaintiffs involved in bankruptcy
4/2/2018	CLER	0.1	Transfer documents recd from ECF system to docket file and create file copy (Docket#535 Preliminary Approval)
4/2/2018	JF	0.1	MD/JF Check-in re status of bankruptcy tracking of settlement-eligible plaintiffs
4/2/2018	JS	0.1	md/js confer about client who has concerns about settlement 0.2
4/2/2018	JS	0.1	Call to confirm contact information
4/2/2018	JS	0.5	Call from opt-in asking for explanation of settlement allocation
4/2/2018	ME	0.4	organize emails from opt-ins regarding updated contact information for tracking purposes
4/2/2018	MD	0.1	md/js confer about client who has concerns about settlement 0.2
4/2/2018	MD	0.2	md review settlement share and employment details for opt-in who has concerns 0.2
4/2/2018	JF	0.2	MD/AD/JF Discuss process to notify the settlement administrator about bankruptcy plaintiffs
4/2/2018	CLER	0.1	PCF client (address verification)
4/2/2018	MD	0.2	edit email to clients re bankruptcy 0.2
4/2/2018	MD	0.1	MD/JF Check-in re status of bankruptcy tracking of settlement-eligible plaintiffs
4/2/2018	MD	0.2	MD/AD/JF Discuss process to notify the settlement administrator about bankruptcy plaintiffs

Date	Staff	Amount of Time	Description
			MD/AD/JF Discuss process to notify the settlement administrator about bankruptcy
4/2/2018	AD	0.2	plaintiffs
4/2/2018	MD	0.2	JS/MD discuss allocation and explanation of calculation
4/2/2018	MD	0.1	respond to ME questions re settlement 0.1
4/2/2018	JF	0.2	AD/JF Discuss plaintiffs involved in bankruptcy (general check-in re process and status)
4/2/2018	CLER	0.1	PCF client (address verification)
4/2/2018	JS	0.2	JS/MD discuss allocation and explanation of calculation
4/2/2018	JF	1.1	Draft/email to team Named Plaintiff service payment declaration
4/2/2018	MD	0.1	MD/JF Check-in re fielding of calls from settlement-eligible plaintiffs involved in bankruptcy
			Transfer documents recd from ECF system to docket file and create file copy (Docket#536
4/2/2018	CLER	0.1	NOTICE of Hearing on Motion Re Final Approval of FLSA Settlement)
4/2/2018	MD	0.1	review final version of mailing for Kellogg settlement 0.1
4/2/2018	ME	0.1	telephone call from opt-in to verify and update contact information
4/2/2018	JS	0.4	Email re: service awards
			ME/JF Discuss the issues in the process of gathering evidence for service payment
4/3/2018	ME	0.2	declarations
4/3/2018	JF	1.3	Re-draft named plaintiff's declaration for attorney review
4/3/2018	CLER	0.1	PCF client (update address)
4/3/2018	AD	1	Coordinate with bankruptcy clients attorneys 1.0
			ME/JF Discuss the issues in the process of gathering evidence for service payment
4/3/2018	JF	0.2	declarations
4/3/2018	AD	0.2	Call with client .2
4/3/2018	JS	0.3	Review and edit draft emails to named plaintiffs and deponents
4/3/2018	AD	3.4	Coordinate with bankruptcy clients attorneys 3.4
4/3/2018	AD	1.7	Coordinate with bankruptcy clients attorneys 1.7
			MA/JF Discuss the process of drafting declarations in support of service payments (for
4/3/2018	JF	0.1	final approval/fairness hearing)
			Review/edit proposed email draft to communicate service awards to named plaintiffs and
4/3/2018	JF	0.4	deponents
			Draft/review/distribute to team the named plaintiff declaration to be used at final
4/3/2018	JF	0.9	fairness hearing to receive service payments
			MA/JF Discuss the process of drafting declarations in support of service payments (for
4/3/2018	MA	0.1	final approval/fairness hearing)
4/3/2018	JS	0.4	Review phone script
4/4/2018	CM	0.1	MD/CM discuss what will be needed for final fairness filing
4/4/2018	AG	0.2	research Bankruptcy docket on Pacer (Faulk)
4/4/2018	MD	0.1	MD/CM discuss what will be needed for final fairness filing
4/4/2018	JF	0.4	Re-draft the named plaintiff declaration (for team review)
			MD/JS/ME/JF Meet re the process of gathering service payments declarations to be
4/4/2018	ME	0.5	submitted for final settlement approval hearing
			MD/JS/ME/JF Meet re the process of gathering service payments declarations to be
4/4/2018	JS	0.5	submitted for final settlement approval hearing
			MD/JS/ME/JF Meet re the process of gathering service payments declarations to be
4/4/2018	MD	0.5	submitted for final settlement approval hearing
4/4/2018	JF	0.3	Call with plaintiff re notice/settlement process
4/4/2018	CLER	0.1	PCF client (confirm mailing address)
4/4/2018	AN	0.1	Call from plaintiff about tax liability of settlement payment

Date	Staff	Amount of Time	Description
4/4/2018	ME	0.2	ME/JF Check-in re follow-up of service award declarations meeting
			MD/JS/ME/JF Meet re the process of gathering service payments declarations to be
4/4/2018	JF	0.5	submitted for final settlement approval hearing
4/4/2018	AD	0.4	Research client bankruptcy documentation .4
4/4/2018	JF	0.2	ME/JF Check-in re follow-up of service award declarations meeting